

1 UNITED STATES DISTRICT COURT  
2 EASTERN DISTRICT OF NEW YORK

COPY

3 -----X

4 LETICIA FRANCINE STIDHUM,

5 Plaintiff,

6 -against-

CASE: 21-CV-07163

7 161-10 HILLSIDE AUTO AVE, LLC d/b/a HILLSIDE  
8 AUTO OUTLET, and HILLSIDE AUTO MALL INC  
9 d/b/a HILLSIDE AUTO MALL, ISHAQUE THANWALLA,  
JORY BARON, RONALD M. BARON and ANDRIS GUZMAN,

10 Defendants.

11 -----X

12 February 24, 2023

13 10:00 A.M.

14  
15 VIRTUAL EXAMINATION BEFORE TRIAL of  
16 ISHAQUE THANWALLA, via Zoom, a Defendant  
17 herein, held at the above-mentioned time and  
18 taken before Lynn Luckman, a Notary Public  
19 and Shorthand Reporter within and for the  
20 State of New York.

21  
22  
23 SANDY SAUNDERS REPORTING  
24 254 South Main Street, Suite 216  
New City, New York 10956  
25 (845) 634-7561

A P P E A R A N C E S:

TROY LAW, PLLC

Attorneys for the Plaintiff

41-25 Kissena Boulevard, Suite 103

Flushing, NY 13555

BY: Tiffany Troy, Esq.

MILMAN LABUDA LAW GROUP, PLLC

3000 Marcus Avenue, Suite 3W8

Lake Success, NY 11042-1073

BY: Emanuel Kataev, Esq

emanuel@millaborlaw.com

FEDERAL STIPULATIONS

IT IS HEREBY STIPULATED AND AGREED by  
and between counsel for the respective parties  
hereto that all objections except as to the  
form shall be reserved to the time of trial.

IT IS FURTHER STIPULATED AND AGREED  
that the sealing and filing of this deposition  
shall be hereby waived.

IT IS FURTHER STIPULATED AND AGREED  
that this examination may be sworn to by the  
witness being examined before a notary public  
other than the notary public before whom  
examination was begun examination was begun.

Ishaque Thanwalla

BY THE COURT REPORTER:

The attorneys participating  
in this deposition  
acknowledge that I am not  
physically present in the  
deposition room and that I  
will be reporting this  
deposition remotely. They  
further acknowledge that, in  
lieu of an oath administered  
in person, I will administer  
the oath remotely. The  
parties and their counsel  
consent to this arrangement  
and waive any objections to  
this manner of reporting.

MS. TROY: I consent

MR. KATAEV: I consent.

\* \* \*

Ishaque Thanwalla

I-S-H-A-Q-U-E T-H-A-N-W-A-L-L-A,

a Defendant herein, after having been  
duly sworn by a Notary Public of the  
State of New York, was examined and  
testified as follows:

BY THE REPORTER:

Q. Please state your full name  
for the record.

A. Ishaque Thanwalla.

Q. Please state your present  
address for the record.

A. Business address: 161-10  
Hillside Avenue Jamaica, New York 11432.  
Home address: 7 Poplar Court, Great  
Neck, New York 11024.

THE COURT REPORTER:

Counsel, Mr. Kataev, will you  
be purchasing a copy of this  
transcript?

MR. KATAEV: I will let  
you know. I will speak to my  
client.

MS. TROY: Let's deem

1 Ishaque Thanwalla

2 marked Plaintiff's Exhibit 1.

3 (Plaintiff's Exhibit 1 deemed  
4 marked for identification).

5 EXAMINATION BY

6 TIFFANY TROY:

7 Q. Mr. Thanwalla, was that your  
8 business address or your home address?

9 A. That is my business address.

10 Q. Can you state your residence for  
11 me as well?

12 A. 7 Poplar Court, Great Neck, New  
13 York 11024.

14 Welcome today.

15 Q. Thank you for welcoming me  
16 today. Have you ever been part of a  
17 deposition before?

18 MR. KATAEV: Objection to  
19 the form. You can answer.

20 A. Yes.

21 Q. Do you know what a deposition  
22 is?

23 A. A deposition is when you ask  
24 questions and I answer the questions.

25 Q. Correct. When was the last time

1 Ishaque Thanwalla

2 that you had a deposition; you just  
3 mentioned that you participated in a  
4 deposition before?

5 MR. KATAEV: Objection to  
6 the form. You can answer.

7 A. That was over 15 years ago.

8 Q. Do you recall for what?

9 A. Not really, I can't recall.

10 Q. Were you a party to a civil  
11 action or was that something else?

12 A. I don't understand that  
13 question. What do you mean by ``civil  
14 action?'' I don't understand the law.

15 Q. By that, I mean was there a  
16 plaintiff bringing an action against the  
17 defendant, and if you were either a  
18 plaintiff or a defendant in a civil action  
19 as opposed to a criminal matter.

20 MR. KATAEV: Objection to  
21 the form.

22 Q. Do you recall what the lawsuit  
23 was about?

24 A. I can't, it was so long ago.

25 Q. Since that is the case, I'm

1 Ishaque Thanwalla  
2 going to briefly explain what a deposition  
3 is and lay some ground rules going forward.

4 A. Okay.

5 Q. First, this deposition is for me  
6 to ask you questions and for you to answer  
7 my questions about the subject matter of  
8 that lawsuit. There is a separate action  
9 covering the wage and hours, and today we're  
10 only going to focus mostly on the pregnancy  
11 discrimination lawsuit; do you understand  
12 that?

13 A. Yes, I understand.

14 Q. Since the court reporter has to  
15 take down everything that you say, I ask  
16 that you give only verbal responses, so no  
17 shaking or nodding or any hand motions, no  
18 gestures; do you understand that?

19 A. I represent to you that I have a  
20 habit, and I may do it as this is just a  
21 habit, but, I might shake my head back and  
22 forth. (Indicating).

23 Q. That is not a problem as long as  
24 there is a verbal response together with the  
25 shaking or nodding of your head; there is no



1 Ishaque Thanwalla

2 problem.

3 A. Okay.

4 Q. For the same reason, please  
5 speak loudly and clearly when you answer a  
6 question; do you understand?

7 A. Yes.

8 Q. The stenographer can only write  
9 one person down speaking at a time.

10 Therefore, please do not start to answer a  
11 question of mine before I finish asking that  
12 question; likewise, I will not start a new  
13 question until you have finished answering  
14 my last question; do you understand?

15 A. Yes.

16 Q. If you need to take a break, for  
17 example to get a drink of water or to use  
18 the restroom, please let me know and I will  
19 call for a recess; do you understand?

20 A. Yes.

21 Q. However, there can be no break  
22 between one of my questions and your answer  
23 to that question; do you understand that?

24 A. I don't understand the question.

25 Q. Let me repeat it. Even if you

1 Ishaque Thanwalla

2 are taking a break at any time, there is an  
3 assumption that you will not be calling for  
4 a break between one of my questions and  
5 before you answer that question; do you  
6 understand that?

7 A. I understand -- you mean if I  
8 ask to take a break and there is a question,  
9 that I have to complete an answer before I  
10 ask for that break?

11 Q. Correct.

12 A. Right, correct.

13 Q. From time to time your attorney  
14 may make objections to my question.  
15 Generally, unless your attorney tells you  
16 not to answer, you will still have to  
17 respond; do you understand?

18 A. Not really. That's why I have  
19 an attorney.

20 Q. Let me backtrack for a second.  
21 From time to time as we are going along in  
22 the deposition, your attorney may make some  
23 objections to my questions saying  
24 ``objection'' for blah blah blah reasons.''

25 A. Right.

1 Ishaque Thanwalla

2 Q. Generally unless your attorney  
3 directs you not to answer, you still need to  
4 respond; do you understand that instruction?

5 A. Not to answer? What's the  
6 reason for him telling me not to answer a  
7 question?

8 MR. KATAEV: She is saying  
9 that if I tell you not to  
10 answer, then we will deal  
11 with that later.

12 THE WITNESS: Yes.

13 Q. Do you understand?

14 A. Yes.

15 Q. If you don't understand a  
16 question, tell me and I will rephrase it so  
17 that you can; do you understand that?

18 A. Yes.

19 Q. If you do not hear a question,  
20 tell me and I will repeat it so that you  
21 can; do you understand?

22 A. Yes.

23 Q. We are here together for facts  
24 and not speculation. If you don't know the  
25 answer to a question, say so; do you

1 Ishaque Thanwalla

2 understand that?

3 A. Yes.

4 Q. Before the deposition, you  
5 mentioned that a deposition took place 15  
6 years ago. Were you ever deposed at any  
7 other time?

8 A. No.

9 Q. Do you understand that you have  
10 taken an oath to tell the truth?

11 A. Yes.

12 Q. Do you understand that your oath  
13 to tell the truth carries the same force and  
14 effect as if you are testifying in Court  
15 before a Judge?

16 A. Yes.

17 Q. Are you currently taking any  
18 medications that could prevent you from  
19 recalling the truth or testifying truthfully  
20 today?

21 A. Not to my knowledge. I do take  
22 a Sudafed for my sinuses.

23 Q. To your knowledge, it would not  
24 affect your ability to tell the truth or  
25 recall truthfully?

1 Ishaque Thanwalla

2 A. Best of my ability, I don't  
3 think so, I don't think it's going to  
4 affect.

5 MS. TROY: Please zoom in  
6 a little bit for the court  
7 reporter.

8 THE WITNESS: Okay.

9 MR. KATAEV: Let the  
10 record reflect that the  
11 plaintiff is present  
12 virtually.

13 Q. Mr. Thanwalla, are you currently  
14 under any physical or emotional condition  
15 that could prevent you from recalling the  
16 truth or testifying truthfully today?

17 A. No.

18 Q. Do you have a cell phone on or  
19 near you?

20 A. Yes.

21 Q. Do you agree that during this  
22 deposition today, except during the break,  
23 you will not be using your cell phone?

24 A. Yes. That's why I just turned  
25 it off.

1 Ishaque Thanwalla

2 Q. Do you understand that except  
3 for the documents that I will be showing you  
4 on the Zoom screen today, that you will not  
5 be reviewing any other documents?

6 A. I will not be reviewing any  
7 other documents. The only ones are the  
8 documents that you provide, is that what you  
9 are saying?

10 Q. Correct.

11 A. Okay.

12 Q. I see that you have a notepad on  
13 the desk. I ask that during the pendency of  
14 this deposition that you do not use that  
15 notepad.

16 MR. KATAEV: It was just  
17 there, we are moving it.

18 (Indicating)

19 A. Yes.

20 Q. During this deposition, to make  
21 things easier for ourselves, I'm going to be  
22 referring to the company 161-10 Hillside  
23 Auto Avenue, LLC, which is doing business as  
24 Hillside Auto Outlet as Hillside Auto  
25 Outlet; do you understand that?

1 Ishaque Thanwalla

2 A. Yes.

3 Q. In the same vein, I'm going to  
4 be referring to the corporate defendant  
5 Hillside Auto Mall Inc., which is doing  
6 business as Hillside Auto Mall; do you  
7 understand that?

8 A. Yes.

9 Q. Do you own the residence that  
10 you gave at the beginning of this  
11 deposition?

12 MR. KATAEV: Objection as  
13 to relevancy. You can answer.

14 A. No.

15 Q. Have you lived anywhere else  
16 within the past five years?

17 A. Yes.

18 Q. Starting from the most recent,  
19 where have you lived besides the residence  
20 that you gave at the beginning of this  
21 deposition?

22 A. In Bayside.

23 Q. Prior to that, was that over 10  
24 years?

25 MR. KATAEV: Objection as

1 Ishaque Thanwalla

2 to relevancy on that

3 question. The witness can

4 answer.

5 Q. Do you know?

6 A. (No response)

7 Q. Do you have the Bayside address?

8 A. Correct.

9 Q. Can you give that to me?

10 A. 1578 Waters Edge Drive,

11 Apartment 1, Bayside, NY 11360.

12 Q. What is your highest level of

13 education?

14 A. High school.

15 Q. What school did you attend?

16 A. Baf. B-A-F High school

17 Q. Was that in the United States?

18 A. No.

19 Q. Where did you attend that high

20 school?

21 A. That was in my country, which

22 was Pakistan that I was born in.

23 Q. What year did you come to the

24 United States?

25 A. I would say in the 80s, early



1 Ishaque Thanwalla

2 80s, but I can't recall the year.

3 Q. Are you familiar with the  
4 Hillside Auto Outlet?

5 MR. KATAEV: Objection to  
6 the form. You can answer.

7 A. Yes.

8 Q. How are you familiar with that  
9 company?

10 A. I run the place and I own 25  
11 percentage in that company.

12 Q. Since when have you run the  
13 place?

14 A. From the day we started.

15 Q. What year?

16 A. It was -- I can't -- I would say  
17 2018, if I'm not wrong.

18 Q. You mentioned that you owned  
19 shares in the company, what percentage did  
20 you own?

21 Q. What was the question again?

22 MS. TROY: Ms. Court  
23 reporter, can you please read  
24 back the last question?  
25 (The reporter read back the

1 Ishaque Thanwalla

2 last question)

3 A. I own 25 percent.

4 Q. Besides that, did that  
5 percentage ever change?

6 A. I don't understand your  
7 question.

8 Q. Did that 25 percent, was that  
9 the same percent from 2018 to the present  
10 day?

11 A. Yes.

12 Q. Who else owns shares of Hillside  
13 Auto Outlet?

14 A. It is Jory, Josh and David.

15 Q. By Josh, do you mean Josh  
16 Aaronson.

17 A. Yes.

18 Q. By Jory, do you mean Jory Baron?

19 A. Yes.

20 Q. By David, do you mean David  
21 Baron?

22 A. Yes.

23 Q. When did David Baron pass away?

24 A. I think it was two years ago.

25 MR. KATAEV: Objection.

1 Ishaque Thanwalla

2 You are talking about facts  
3 not in evidence, but he  
4 answered.

5 THE COURT REPORTER: A lot  
6 of times I even asked him he  
7 said it's fine, I asked him  
8 ``do you want me to put in the  
9 objection before he answers  
10 or after he answers'' and he  
11 kept saying leave it alone.  
12 So, he objects after the  
13 question it answered.

14 Q. What percentage did Jory Baron  
15 own in Hillside Auto Outlet?

16 MR. KATAEV: Objection to  
17 the form. You can answer.

18 A. Twenty five percent.

19 Q. How about Josh Aaronson?

20 MR. KATAEV: Same  
21 objection. You can answer.

22 A. Twenty five percent.

23 Q. David Baron own the remaining 25  
24 percent; is that correct?

25 A. Yes.

1 Ishaque Thanwalla

2 Q. Was that the same from the start  
3 of the company from 2018 to the present day?

4 A. Didn't you already ask me that  
5 and I answered?

6 MR. KATAEV: Objection as  
7 to asked and answered. You  
8 may answer again.

9 A. Yes.

10 Q. Specifically, I mean just not  
11 your own shares, but the other people's  
12 shares also represented 25 percent from 2018  
13 to the present day; is that correct?

14 A. Yes.

15 Q. Are you currently employed?

16 A. Well, what exactly do you mean,  
17 do you mean if I own shares of my company  
18 and I run the company?

19 Q. I mean --

20 A. So, what exactly do you mean,  
21 define employed. I am running my own  
22 company that I own 25 percent of, is that  
23 what you are referring to?

24 MS. TROY: I will rephrase  
25 the last question.

1 Ishaque Thanwalla

2 A. Please.

3 Q. Besides Hillside Auto Outlet, do  
4 you currently run any other company?

5 A. No.

6 Q. Are you familiar with a company  
7 Hillside Auto Mall?

8 A. I am. Oh, what was the question  
9 again? Am I aware of a company called  
10 Hillside Auto Mall?

11 Q. Familiar.

12 A. Yes, I am familiar with it.

13 Q. How are you familiar with it?

14 A. The way I am familiar with that  
15 is my partners may have a shareholder on  
16 that company.

17 Q. By that, do you mean Ronald  
18 Baron, Josh Aaronson and Raymond Phelan. P-  
19 H-E-L-A-N?

20 A. Yes, possibly.

21 MR. KATAEV: Objection to  
22 the form of that question.

23 Q. Do you have the address for  
24 Hillside Auto Mall?

25 A. The Mall? I can't remember

1 Ishaque Thanwalla

2 their address.

3 Q. How about do you know how far it  
4 is from Hillside Auto Outlet?

5 MR. KATAEV: Objection to  
6 the form as to relevancy, you  
7 can answer.

8 A. Approximately 10 or 11 blocks.

9 Q. Are you familiar with Shylet S-  
10 H-Y-L-E-T Motors?

11 A. Yes.

12 Q. How are you familiar with them?

13 A. Yes, they are across the street  
14 from me.

15 Q. ``By me`` do you mean Hillside  
16 Auto Outlet; correct?

17 A. Yes.

18 Q. How about Gateway Car  
19 Dealership?

20 A. They are on the -- they're close  
21 to Hillside Auto Mall.

22 Q. How about Best Auto Outlet?

23 A. I'm confused with these  
24 questions and why you are asking --

25 Q. Please don't, please just answer

1 Ishaque Thanwalla

2 my questions, don't question my question.

3 MR. KATAEV: Objection as

4 to relevancy. You can answer

5 the question.

6 A. Best Auto Outlet is I think in  
7 Suffolk County.

8 Q. Did Hillside Auto Outlet  
9 employees, meaning the car salespeople ever  
10 sell cars from nearby auto outlets or  
11 dealerships?

12 A. Can you clarify that question?

13 Q. The question is a yes or no  
14 question. My question is: have Hillside  
15 Auto Outlet car salespeople ever sold cars  
16 from other dealerships during their  
17 employment with Hillside Auto Outlet?

18 A. In our business, yes, you  
19 mentioned a lot of dealerships names. So,  
20 the customer, so if a customer comes to us  
21 and we don't have a car in our stock, so we  
22 look at the sales, we look at anywhere if  
23 they have a car available, and we call them  
24 and request them and we can buy their car to  
25 sell to our client. Does that answer your

1 Ishaque Thanwalla

2 question?

3 Q. To your knowledge, do any of  
4 your partners own shares in Shylet Motors?

5 A. Not that I know of.

6 Q. How about Gateway Car  
7 Dealership?

8 A. Not that I know of.

9 Q. Have you ever spoken with  
10 Hillside Auto Outlet employees concerning  
11 where they should take the customers if the  
12 customers did not like any cars in the lots  
13 of Hillside Auto Outlet?

14 A. Are you asking me -- let me  
15 understand this question correctly. Did I  
16 ask if a car is not in stock, if we can go  
17 to the car dealer across the street, did I  
18 ask my salespeople to show them a car, is  
19 that what you are asking?

20 MS. TROY: You can answer  
21 my question first based on  
22 your understanding and then I  
23 will follow-up with more  
24 questions.

25 A. That's what my understanding is,



1 Ishaque Thanwalla

2 that's what you are asking me, and I don't  
3 know the right way or the wrong way to  
4 answer the question.

5 Q. Again, I'm asking you to answer  
6 the questions based on your understanding of  
7 the question.

8 A. This is my understanding --

9 MR. KATAEV: Let me just  
10 say this to help both of you  
11 out. You have to answer the  
12 question, you cannot ask her  
13 questions. But, if in your  
14 question it is based on your  
15 understanding --

16 THE WITNESS: My  
17 understanding is that she's  
18 mentioning if I don't have a  
19 car, my salespeople can go  
20 across the street and bring  
21 the car to my lot and then  
22 sell it? Is that right?

23 Q. Have you ever told any Hillside  
24 Auto Outlet employees that you better not  
25 sell the car from the other dealerships,

1 Ishaque Thanwalla

2 mostly you should do so and sell the car  
3 from Hillside Auto Mall?

4 A. Are you saying don't sell anyone  
5 the car from the dealership across the  
6 street but Hillside Auto Mall, is that what  
7 you are asking me?

8 Q. Yes.

9 A. No. Why would I hurt my own  
10 sales?

11 Q. Have you ever informed them  
12 because Hillside Auto Mall is owned in part  
13 by your partners, Hillside Auto Outlet, they  
14 did not have the cars available that you  
15 preferred, your preference was for them to  
16 go to the Hillside Auto Mall?

17 A. No. We look for the inventory  
18 wherever it's available and that's why we  
19 sell the cars. That is we pick up the car  
20 and bring the car and sell it on our lot.

21 Q. Have you ever told Hillside Auto  
22 employees, Hillside Outlet Auto employees,  
23 that you have a preference for them to sell  
24 cars if a car is not available at Hillside  
25 Auto Outlet for them to go to Hillside Auto

1 Ishaque Thanwalla

2 Mall?

3 MR. KATAEV: Objection to

4 the form. Asked and answered,

5 you can answer again.

6 A. No.

7 Q. What are your responsibilities

8 as the owner, part-owner of Hillside Auto

9 Outlet?

10 A. My title is general manager.

11 That consists of a lot of responsibilities:

12 hiring the employees, firing the employees,

13 making sure that the deals are done the

14 right way, making sure that the deals are

15 funded, making sure it is running smoothly,

16 the operations are running smoothly, making

17 sure the inventory is serviced, making sure

18 everything with the DMV is done correctly

19 and on time. If it's not done correctly and

20 on time, I have to make sure that I have to

21 discipline the people who are in that

22 department.

23 I have to look into every department

24 and make sure everything is running smoothly

25 and in a timely fashion where it does not

1 Ishaque Thanwalla

2 affect the business licenses and compliance  
3 as well.

4 Q. You mentioned that part of your  
5 responsibilities were to hire employees. Do  
6 you recall hiring Leticia Stidhum?

7 A. Yes, very well.

8 Q. Can you describe what the hiring  
9 process was like?

10 A. She came for an interview and  
11 she sent a resume to Craig's list, if I can  
12 recall that and she came in and interviewed  
13 with me. I like to give people an  
14 opportunity when anyone walks in, if it's a  
15 candidate that is intelligent enough to hold  
16 a conversation right away, and then I hire  
17 them.

18 Q. Do you recall when you hired  
19 her, the date?

20 A. I can't recall that.

21 Q. During that conversation, during  
22 that hiring process that you just described,  
23 did you tell her what her pay was going to  
24 be?

25 A. Yes, well, yes. She is a

1 Ishaque Thanwalla  
2 commission salesperson and her compensation  
3 consisted of approximately \$300 a week  
4 salary, plus \$150 commission, plus bonus,  
5 also, if there was any individual car that  
6 had a bonus. We have many bonuses, we have  
7 weekly bonuses, we have daily bonuses,  
8 certain cars, it's old age and we have a  
9 bonus.

10 Q. To clarify, when you said plus  
11 \$150 commission, is that \$150 per car  
12 commission?

13 A. It's called a flat commission  
14 rate, yes. Plus the salary, plus the  
15 bonuses if there are any changes.

16 Q. Can you describe for me what the  
17 differences are between the monthly, weekly,  
18 and daily bonuses?

19 A. Okay, very simple. Let's take  
20 one step at a time. So, you have a salary  
21 as a side salary, correct? If they sell a  
22 car, they have \$150 flat commission, and  
23 let's putting that aside for a second.

24 Now, let me explain what the bonuses  
25 are, so certain cars are old age, and as an

1 Ishaque Thanwalla

2 example, in this industry, if we have a car  
3 for over 60 days we like to get rid of it as  
4 fast as possible because it is costing us  
5 and it is depreciating, the money is  
6 depreciating. So, we may add another \$20 or  
7 \$25 as a bonus.

8 Sometimes the car is 90 days old, it's a  
9 90-day old unit, and we may put \$50 or even  
10 5 percent additional commission on that,  
11 depending on the day.

12 Q. Specifically, when we were  
13 talking about Leticia, what was the bonuses  
14 that were promised to her?

15 MR. KATAEV: Objection to  
16 the form. You can answer.

17 A. There is no promises to begin  
18 with, only thing we would tell you our  
19 bonuses, our bonus structure changes daily,  
20 weekly, and monthly. So, whatever was in  
21 that week, that is the bonus that she got.  
22 If there's a 5 percent or \$25 additional or  
23 \$50 additional, or maybe \$500. I can't  
24 answer that question 100 percent. To the  
25 best of my ability, I have given you the

1 Ishaque Thanwalla  
2 complete structure. It could be 5 percent,  
3 25 percent, it could be \$5 -- I'm sorry, it  
4 could be \$50. Maybe a bigger bonus for that  
5 week based on the day, based on the time.  
6 Every day they have new bonuses, not exactly  
7 every day, but let's say on a Saturday just  
8 to give you an example, you sell three cars  
9 and deliver those cars. You get additional  
10 \$100 bonus. So, which we provide bonuses or  
11 we will say ``it's three cars,`` and we're  
12 going to ``give you additional 5 percent.``  
13 It all depends.

14 Q. So, let's break down the  
15 conversation that happened during hiring;  
16 did you talk at all about the schedule,  
17 meaning the work schedule that Leticia would  
18 be given as a commission salesperson?

19 A. Yes. She was to get a 40-hour  
20 schedule.

21 Q. Can you tell me what that  
22 schedule is?

23 A. How can I tell you? I don't  
24 have a schedule in front of me.

25 Q. Did she regularly work a certain

1 Ishaque Thanwalla

2 number of days or did that change from week-  
3 to-week?

4 A. Some days she worked five days,  
5 most of the time, but she usually would have  
6 weekdays, Thursday, Tuesday, depending on  
7 your schedule off, you would have a Sunday.  
8 All of the schedules changed every week,  
9 every industry, you have to come in the  
10 beginning of a week, and you get the  
11 schedule.

12 Q. Can you tell me what time she  
13 would be expected to arrive at work?

14 A. About 10 o'clock.

15 Q. How about what time would she be  
16 expected to leave work?

17 A. The work time would be our  
18 business hours are between 10:00 and 7:00 or  
19 10:00 to 8:00. It also depends, if it's  
20 wintertime or summertime.

21 Q. Let's start from the wintertime,  
22 what would that time be?

23 A. About 10:00 to 7:00.

24 Q. How about the summertime?

25 A. Mostly it's 10 to 8:00 is the



1 Ishaque Thanwalla  
2 schedule or the dealership opens hours, not  
3 the schedule hours. But the dealership is  
4 open through 10:00 and 8:00. So, maybe  
5 Leticia would start at 12:00 to 8:00 or  
6 10:00 to 6:00, something like that. It all  
7 depends.

8 Q. How would you describe the foot  
9 traffic at Hillside Auto Outlet, and in  
10 terms of the timeframe, you can say  
11 generally, or specifically, but I'm asking  
12 about 2019.

13 A. When you say ``foot traffic,`` can  
14 you give me a little more elaboration?

15 Q. Sure. Would you describe your  
16 store as a busy store and the timeframe is  
17 2019?

18 A. Which timeframe?

19 Q. The year 2019.

20 A. It is too long for me to  
21 describe that. Our business changes based  
22 on the season.

23 Q. So, why don't you just describe  
24 for me generally what the business was like  
25 based on the season.

1 Ishaque Thanwalla

2 A. Okay. Giving you an example, it  
3 would be busy traffic after March, it would  
4 be busy; April, May, June, July August,  
5 starting to go down; September goes down;  
6 October, November is slow and December is  
7 very slow, and January is slow. February is  
8 slow and in March it starts to pick up.

9 Q. So, you would describe March  
10 through August as the busy months?

11 A. Correct.

12 Q. September through February as  
13 less than busy?

14 A. Less busy, you got it right.

15 Q. How many cars would Hillside  
16 Auto Outlet sell on a monthly or weekly  
17 basis, on a monthly or weekly basis between  
18 March and August?

19 MR. KATAEV: Objection as  
20 to compound. You can answer  
21 the question.

22 A. March would be a busy month and  
23 I can't really give you a number. So, I  
24 would say 72 or 75 cars in March and April,  
25 and somewhere around that neighborhood and

1 Ishaque Thanwalla

2 October and November and December would slow  
3 down to 30 or 50 cars a month.

4 It's not only our -- my dealership, it's 90  
5 percent of the dealerships.

6 Q. Has Leticia ever worked a mixed  
7 schedule, meaning a schedule that was not  
8 fixed during her time at Hillside Auto?

9 A. What do you mean by ``mixed  
10 schedule?'' It's confusing to me.

11 MS. TROY: Let me  
12 rephrase it.

13 THE WITNESS: Thank you.

14 Q. When Leticia worked for Hillside  
15 Auto Mall, she always reported to work at  
16 10:00 a.m.?

17 A. She never worked for Auto Mall.

18 Q. I mean Hillside Outlet.

19 A. That is Outlet, not the Mall.  
20 You just said ``Mall,`` that is why she has  
21 never worked for the mall. She worked for  
22 only Hillside Auto outlet.

23 Q. My question is: when Leticia  
24 worked for Hillside Auto Outlet, did she  
25 always start working at 10:00 a.m.?

1 Ishaque Thanwalla

2 A. No, some days she worked late  
3 and some days she was off. I think she chose  
4 -- how can she be if she always started at  
5 10:00 a.m.?

6 A. Is it fair to say that on days  
7 that she worked, she would start working at  
8 10:00?

9 A. I can't -- you are repeating  
10 yourself on this question which is as I  
11 said, based on her schedule. If her shift  
12 started, let's say she started late, if her  
13 shift started at 10 o'clock, she would start  
14 at 10 o'clock and her shift says she was  
15 supposed to start at 11:00 or 12:00, she  
16 would start at 11:00 or 12:00.

17 MR. KATAEV: Objection to  
18 that. It was asked and  
19 answered already.

20 Q. Are you saying that there is a  
21 10:00 a.m. shift and 11:00 a.m. shift and a  
22 12:00 p.m. shift?

23 MR. KATAEV: Objection to  
24 form. You can answer.

25 A. Correct.

1 Ishaque Thanwalla

2 Q. Regardless of what time Leticia  
3 started, what time would she end work?

4 A. She would end work when the  
5 shift is finished.

6 Q. When would the shift be  
7 finished; let's start from the 10:00 a.m.  
8 shift?

9 A. When I gave you the answer for  
10 my question, what time the operating hours  
11 are, the hours are 7 in the wintertime and 8  
12 in the summertime.

13 MR. KATAEV: Objection.

14 Asked and answered.

15 Q. During the workday, would she  
16 have any break time?

17 A. Sure she did, she went out for  
18 the break, always did. Her and David  
19 Manrique.

20 Q. Was there a fixed time for  
21 break?

22 A. Fixed time for break? This is  
23 how the break works. It's an eight-hour  
24 shift and they can either take a whole hour  
25 or they can take two different breaks, 25 or

1 Ishaque Thanwalla

2 15 minute breaks and one and one half hour  
3 break. It depends on them.

4 Q. Is that every workday?

5 A. Every workday. Why would it be  
6 different?

7 Q. During that, and let's talk  
8 about that for a second, is there a time  
9 clock at Hillside Auto?

10 A. No.

11 Q. Was there a method by Hillside  
12 Auto to keep track of the employee's  
13 attendance?

14 A. We used to keep track, yes. That  
15 is how they got paid.

16 Q. Can you describe how the  
17 employee's time was kept track of?

18 A. They came and signed-in and when  
19 they went out for a break, they signed out  
20 at the desk.

21 Q. Do you still have those records?

22 A. Unfortunately, we had a robbery.  
23 There were a lot of records that were  
24 missing, that was missing.

25 Q. When did the robbery take place?

1 Ishaque Thanwalla

2 A. I can't recall the exact date.

3 Q. Do you recall the year?

4 A. Yes, it was 2019 or 2018. I  
5 have no idea, I have to look.

6 Q. Was a police report filed in  
7 conjunction with the robbery?

8 A. Yes.

9 Q. Besides the employee's  
10 attendance records, what else was taken?

11 A. Quite a few files that I can't  
12 remember exactly what it was.

13 Q. Are you familiar with an  
14 individual by the name of Deana Jennings?

15 A. Yes.

16 Q. How are you familiar with her?

17 A. She was the controller at the  
18 time.

19 Q. What is her role now?

20 A. To make sure the payroll is  
21 done, making sure the deals were funded,  
22 making sure the accountings were good.

23 Q. Was her role in 2018 and 2019  
24 the same as her role is now?

25 A. She's no longer working with me;

1 Ishaque Thanwalla

2 I have a new controller and her name is  
3 Susan.

4 Q. When did Deana Jennings leave  
5 work at Hillside Outlet?

6 A. I can't recall the exact date.

7 Q. What was Deana Jennings'  
8 position before she left?

9 A. I don't understand your  
10 question.

11 Q. Did she have a title, like for  
12 instance, you are the general manager,  
13 right? Did she have a title?

14 A. Yes, I answered that question to  
15 you as her title was controller.

16 Q. Was she employed by Hillside  
17 Auto Outlet?

18 A. Yes.

19 Q. Was she also employed at the  
20 same time at Hillside Auto Mall?

21 MR. KATAEV: Objection to  
22 the form. You can answer.

23 A. Yes.

24 Q. What was her title at Hillside  
25 Auto Mall?



1 Ishaque Thanwalla

2 A. I can't answer that question  
3 because I don't know. Anybody can have two  
4 jobs, it's certainly not my place. Certain  
5 hours at my place and certain hours -- I  
6 can't answer that, what she did over there.

7 Q. To your knowledge, was she also  
8 in charge of billing at Hillside Auto Mall?

9 MR. KATAEV: Objection to the  
10 form. You can answer.

11 A. I can't answer that question., I  
12 don't know. I don't go there for me to see  
13 what she does.

14 Q. Right now you've stated that you  
15 have a new controller and the name is Susan.  
16 Do you have Susan's last name?

17 A. Her last name is -- I can't  
18 pronounce it, but I call her Susan ``Z``. I  
19 can get the name for you; she has been with  
20 me since a long time.

21 Q. Do you know how to spell her  
22 last name even if you can't pronounce it.

23 A. I can't, I will make a phone  
24 call when you give me a break.

25 MS. TROY: Understood. We

1 Ishaque Thanwalla

2 will leave a blank space in  
3 the record for the last name  
4 for you to fill in  
5 subsequently. Thank you for  
6 being helpful.

7  
8 (insert)

9 THE WITNESS: You're  
10 always welcome.

11 Q. Does she also work for Hillside  
12 Auto Mall currently?

13 A. No.

14 Q. How do you know?

15 A. How do I know? Because she was  
16 working for me full-time.

17 Q. Are you telling me that Deana  
18 Jennings did not work for you full-time  
19 before?

20 A. Not full-time.

21 Q. What was her schedule?

22 A. I can't recall.

23 Q. Why did she leave work?

24 A. I answered that question prior,  
25 I can't recall.

1 Ishaque Thanwalla

2 MR. KATAEV: Objection.

3 Asked and answered.

4 MR. KATAEV: Can we take a  
5 quick break so that I can  
6 stop coughing so much? We  
7 can take that break whenever  
8 you want.

9 MS. TROY: We can take  
10 that five-minute break right  
11 now and come back at 10:51,  
12 if that sounds good to you.

13 MR. KATAEV: 10:50 is  
14 fine.

15 (A recess was taken from  
16 10:47 a.m. until 10:51 a.m.)

17 Q. Mr. Thanwalla, when is your  
18 birthday?

19 A. My birthday is 5-11-1963.

20 Q. What are the last four digits of  
21 your social security number?

22 A. Why do you need my social  
23 security?

24 Q. For identification purposes.

25 A. You have -- you will get a copy

1 Ishaque Thanwalla  
2 of my driver's license. That is my privacy  
3 and I don't like to give it out while the  
4 plaintiff is present on the iPhone.

5 MR. KATAEV: I'm going to  
6 object to this ongoing  
7 embarrassment and for the  
8 latest items, under Rule 50.

9 Q. Do you have it?

10 A. Do I have what?

11 Q. Do you have your social security  
12 number?

13 I just need the last four and we can  
14 agree that is not going to be -- that it's  
15 going to be marked it's not going to be  
16 prejudicial and it's going to be marked as  
17 confidential.

18 THE WITNESS: I don't  
19 remember it right now.

20 MS. TROY: Fine, just  
21 please fill it out  
22 subsequently, and we agree  
23 again, we will be marking  
24 this as personal and  
25 confidential in the

1 Ishaque Thanwalla

2 transcript.

3  
4 (insert)

5 Q. Back on the record now, Mr.  
6 Thanwalla, did the pay structure that you  
7 mentioned earlier ever change for Leticia  
8 Stidhum?

9 A. I answered that question, it's  
10 bonuses and things that we give. So, it's a  
11 yes, it changes not just for Leticia, for  
12 everyone. It's based on the daily bonuses,  
13 the weekly bonuses and the monthly bonuses.  
14 I have answered your question more than  
15 once.

16 MR. KATAEV: Objection.

17 Asked and answered.

18 Q. How about the \$300 weekly plus  
19 the \$150 flat commission, did that ever  
20 change?

21 A. Not to my knowledge.

22 Q. Were all of your car salesmen  
23 paid \$300 base weekly pay or did some get  
24 more or less than that amount?

25 MR. KATAEV: Objection

1 Ishaque Thanwalla

2 irrelevant. You can answer.

3 A. Everybody is different, most of  
4 them got paid \$300.

5 Q. Did anyone, during Leticia's  
6 employment, get paid \$350 a week?

7 A. I can't remember, possible based  
8 on seniority.

9 Q. How about \$200 per week?

10 A. I can't answer that question, I  
11 don't think so, but ---

12 Q. How about \$500 per week?

13 A. You are repeating the question  
14 again and again. I said ``no,'' numerous  
15 times. How many times do I have to say ``no?''

16 Q. By ``no'' do you mean that you did  
17 not pay anyone \$500 base weekly salary?

18 MR. KATAEV: Objection as  
19 asked and answered.

20 MS. TROY: I am on the  
21 last question in that line,  
22 please answer to the best of  
23 your ability.

24 A. I can't recall.

25 Q. How about \$600 per week in base

1 Ishaque Thanwalla

2 weekly salary; did anyone during Leticia's  
3 employment get paid that amount?

4 A. I think the managers did.

5 Q. The managers got paid that base  
6 weekly salary plus a commission; is that  
7 correct?

8 A. Yes.

9 MR. KATAEV: Objection as  
10 to relevance. You can answer.

11 Q. You also mentioned the weekly  
12 schedule, did the weekly schedule ever  
13 change for Leticia between the start of her  
14 employment until the end of her employment?

15 A. I answered that question  
16 previously, every week or every two weeks  
17 the schedule changed for everyone.

18 MR. KATAEV: Objection as  
19 to asked and answered.

20 Q. What were the store hours for  
21 Hillside Outlet and the timeframe is 2018  
22 and 2019?

23 MR. KATAEV: Objection.

24 Asked and answered. You can  
25 answer.

1 Ishaque Thanwalla

2 A. I have answered that question  
3 previously to you that the winter hours,  
4 about the winter hours and the summer hours.

5 MS. TROY: You can answer  
6 it again.

7 A. It is 10:00 to 7:00 in the  
8 winter and the summertime mostly it is 10:00  
9 to 8:00.

10 Q. If a customer came in before the  
11 store closed, would the car salespeople have  
12 to serve the customer even if it's around  
13 the store closing time?

14 A. It's mostly the finance manager  
15 would have to serve. The salesmen did not -  
16 - they did their jobs and they could leave  
17 it to the finance manager, he stays because  
18 they are managers and they have to finish  
19 the job.

20 Q. Were there ever times when  
21 Hillside Auto Outlet salespeople had to stay  
22 after the store closing time?

23 A. Not have to stay, but they  
24 stayed on their time. It was goodwill if  
25 they wanted to, it's their choice to stay



1 Ishaque Thanwalla

2 because it's their deal. If they want to  
3 stay, they're welcome to stay, if they  
4 weren't staying, they didn't have to stay.  
5 We made sure that they got compensated.

6 Q. Typically, how long would they  
7 stay after if there was a customer that came  
8 in before the closing time?

9 A. What do you mean by ``before the  
10 closing time?'' Right at closing time or  
11 hours before closing time or two hours? It  
12 all depends on the deal, how long it takes  
13 for the bank to reply back and give us an  
14 answer. You can stay between 30 to 70  
15 minutes to reply back and sometimes it may  
16 take longer than that. It all depends, and  
17 that's my answer for that question. It's my  
18 answer because it is industry -- it's the  
19 auto industry and it works differently than  
20 most of the other industries.

21 We cannot answer when the bank is going  
22 to reply back and give us approval on the  
23 documents. All the documents on there are  
24 there and there is a lot of puzzles that  
25 need to be put together before we can say

1 Ishaque Thanwalla

2 that they're going to stay longer or the

3 customer is going to come back tomorrow.

4 Does that answer your question?

5 Q. Why don't you walk me through

6 the different pieces of the puzzle that need

7 to be put together?

8 MR. KATAEV: Objection to

9 the form. You can answer.

10 A. The puzzle, to put it together,

11 the customer walks in and the salesman

12 approaches them and greets them, correct?

13 Show them a car, then they take a credit

14 application. Once they take the credit

15 application, we will ask to have some

16 documentation, and we run the credit before

17 we have any documentation, meaning pay

18 stubs, bank statements, and utility bills.

19 It all depends, so we run the credit based

20 on that. We will ask the salesman to get --

21 to collect all the documentation and they

22 try to get that, and it could take between

23 30 and 40 minutes.

24 From there, we put the deal into

25 finance, and once the papers are all

1 Ishaque Thanwalla

2 together, sometimes we don't have the  
3 paperwork together and we try to do it so  
4 that we can upload the documentation.  
5 Later, when the salesman is trying to get  
6 that, they get the price, and then 40 or 50  
7 minutes later, whatever time it takes.

8 So, once you get approval, we search the  
9 numbers and give the numbers to the  
10 customer, the sales price, the car payments,  
11 if they want to buy any accessories. Once  
12 that is all done, the finance manager will  
13 get the approval, the finance manager will  
14 sign the contract and the guy would deliver  
15 the car.

16 Q. If the customer came in right  
17 before the closing time, would sometimes  
18 Hillside Auto Outlet car salespeople have to  
19 stay until 9:00, 10:00 or 11 o'clock to  
20 finish the deal?

21 MR. KATAEV: Objection.

22 Asked and answered. You can  
23 answer that again.

24 A. You have asked me that question  
25 already. When you say ``have to stay,'' I

1 Ishaque Thanwalla  
2 answered that question. No, I said no.  
3 Based on the salesperson, if they want to  
4 stay on their own goodwill. Are you going  
5 to be repeating the same question a second  
6 time?

7 MR. KATAEV: Please answer  
8 the question.

9 MS. TROY: Please just  
10 answer my questions, and  
11 again, I appreciate your  
12 various comments. But, this  
13 is not your deposition. So,  
14 please stop giving me  
15 directions and just answer my  
16 questions so that we can get  
17 this done as soon as  
18 possible.

19 MR. KATAEV: How long?

20 MS. TROY: Let's go off  
21 the record.

22 (A discussion was held off  
23 the record)

24 Q. Were there times when Leticia  
25 Stidhum stayed until 9:00 or 10 o'clock or

1 Ishaque Thanwalla

2 11 o'clock on her ``own goodwill`` as you put  
3 it?

4 A. Would not even know, my store  
5 was open 9:00 or 10:00 or 11:00, we may have  
6 stayed to 8:00, or maybe 9 o'clock.

7 Q. How about during the summertime,  
8 were there times when Leticia had to stay  
9 until 9:00 or 10:00 or 11:00 p.m.?

10 A. I answered that question for the  
11 summertime. I said 8 o'clock up to 9  
12 o'clock. I did not say 7 to 8 o'clock.

13 Q. How would you describe Leticia  
14 as a car saleswoman at Hillside Auto Outlet?

15 MR. KATAEV: Objection.

16 Vague, but you can answer.

17 A. I hired her, I trained her. She  
18 was a very good salesperson.

19 Q. Do you recall of the 70 to 75  
20 cars that Hillside Auto Outlet sold overall  
21 for the months, how many cars would Leticia  
22 sell when she was employed?

23 A. I answered that, but I would say  
24 between 20 and 25, sometimes 15. It  
25 depended on her month and her ability.

1 Ishaque Thanwalla

2 Q. How about for the months of  
3 September through February, obviously she  
4 did not work there until February during the  
5 less busy months, as you called it, how many  
6 of the 40 to 50 cars that would be sold by  
7 Hillside Auto Outlet overall would be sold  
8 by Leticia?

9 A. I answered that question.  
10 Between 15 and 25.

11 Q. Are you familiar with the  
12 software called DealerTrak?

13 A. (No response)

14 MR. KATAEV: If you can  
15 answer the question.

16 A. Yes.

17 Q. How are you familiar with it?

18 A. It's a dealer deal management  
19 system.

20 Q. At Hillside Auto Outlet between  
21 2018 and 2019, who had the username of the  
22 DealerTrak system?

23 A. To the best of my knowledge, it  
24 was me, it was Jeanique J-E-A-N-I-Q-U-E. I  
25 believe that was -- also, Serge, and I would

1 Ishaque Thanwalla

2 say Louis.

3 Q. Who is Jeanique?

4 A. Jeanique was my manager.

5 Q. From what date to what date?

6 A. I can't recall. I don't know  
7 exactly.

8 Q. Who is Serge?

9 A. Finance manager.

10 Q. Again, from what date to what  
11 date?

12 A. He's still working and I don't  
13 know when he started.

14 Q. Who is Louis?

15 A. Finance manager.

16 Q. Between 2018 and 2019, did  
17 anyone else have a username in the  
18 DealerTrak system?

19 A. Maybe we can run the DealerTrak  
20 and find out.

21 Q. Do you know an individual by the  
22 name of Andris Guzman?

23 A. Yes.

24 Q. Who is he?

25 A. Manager.

1 Ishaque Thanwalla

2 Q. When did he start working for  
3 Hillside Auto Outlet?

4 A. I can't recall the date that he  
5 started, neither can I recall the date that  
6 he finished.

7 Q. Do you recall the year?

8 A. 2018/2019/maybe 2020. I don't  
9 know when he left.

10 Q. When you say 2018/2019 or 2020,  
11 do you mean the year he started or finished  
12 or both?

13 A. I said 2018/2019 or 2020. I  
14 don't know when he left, started in 2018.

15 Q. When he started in 2018, was he  
16 the manager?

17 A. He was my assistant.

18 Q. When did he become the manager?

19 A. He was my assistant manager,  
20 that's what I meant.

21 Q. Did his position ever change  
22 from the time when he began in 2018 as the  
23 assistant manager?

24 A. Not that I can recall.

25 Q. Earlier you mentioned that you



1 Ishaque Thanwalla

2 do not recall when Jeanique left Hillside  
3 Auto Outlet; do you recall what year?

4 A. It was 2018, if I'm not wrong.

5 Q. Do you recall what month?

6 A. No.

7 Q. Was there a point when Andris  
8 Guzman was employed as assistant manager to  
9 Jeanique's position?

10 A. Not that I can recall, Jeanique  
11 was assistant too because I have to have two  
12 managers because of the hourly schedule.  
13 So, one had to cover the time in the  
14 afternoon, and it was me who put out the  
15 hours from the morning until late, again.  
16 I'm going to -- I go in as early as possible  
17 and I come out mostly the last person.

18 Q. Is it fair to say that Andris  
19 Guzman took Jeanique's position after she  
20 left Hillside Auto Outlet?

21 A. No. He had the same rank as  
22 Jeanique. How can he take her place? They  
23 were both my assistants.

24 Q. Before Jeanique left Hillside  
25 Auto Outlet, were car salesmen promised

1 Ishaque Thanwalla

2 commissions on top of the amount that you  
3 just mentioned, the 300 weekly plus the \$150  
4 flat rate.

5 A. When you say ``on top of,`` let me  
6 just answer your question. I have answered  
7 that question, that nobody was promised, and  
8 every day there is a different bonus up to 5  
9 percent on a car. That can change daily, on  
10 a daily basis on a car on a weekly or a  
11 monthly basis. So, yes there were bonuses  
12 that we put out and nobody was promised  
13 anything but \$150.

14 MR. KATAEV: Objection to  
15 the form of that.

16 Q. Do you agree that 5 percent of  
17 the \$3,000 is 150?

18 A. Do I agree mathematically? I  
19 agree, but I don't know why you are asking  
20 this question, who you are asking this  
21 question to.

22 Q. Between 2018 and when Leticia  
23 began working at Hillside Auto Outlet until  
24 in or around July or August of 2018, was  
25 there in fact an incentive structure in

1 Ishaque Thanwalla

2 place whereby the car salesman were promised  
3 a 5 percent for the sales made in excess of  
4 \$3,000?

5 A. When you go back to your  
6 question, please stop saying ``promise,``  
7 because I have not promised anything. I  
8 have answered that question numerous times.  
9 So, it is a little bit annoying, forgive me  
10 to say that, but you say ``promise, promise,``  
11 there is no promise. I answered that  
12 question maybe 7 times prior to that we have  
13 a bonus structure in place.

14 You understand that or are you going to  
15 go back and ask me the same question again  
16 and again? ``Promise, promise,`` I never  
17 promised any of my employees. We do a bonus  
18 program that we do every day and sometimes  
19 we don't have it, sometimes we do. Yes,  
20 there is no promise, but there is a bonus  
21 structure depending on the day and the month  
22 and the week. Did that completely answer  
23 your question?

24 Q. In fact, did the bonus structure  
25 stay the same in or around July or August --

1 Ishaque Thanwalla

2 A. It still stays the same.

3 Q. Did Hillside Auto Outlet in fact  
4 pay a 5 percent bonus for sales done in  
5 excess of \$3,000 between 2018 and in or  
6 around July or August of 2018?

7 A. Let me answer your question.  
8 You are asking me if they were paid beyond  
9 above 5 percent over \$3,000?

10 Let me answer that question as to no,  
11 based on the bonus, sometimes we did and  
12 sometimes we did not. Does that answer your  
13 question?

14 Q. By that, let's go a step  
15 further: between 2018 and July or August of  
16 2019, did Hillside Auto Outlet in fact pay 5  
17 percent that we were just mentioning?

18 A. The answer is no, 5 percent was  
19 the bonus subject to the car, subject to the  
20 day, subject to the week, and it changed.  
21 There was sometimes there was not until  
22 today's date the same plan or structure.

23 Q. Is it fair to say that when  
24 Jeanique left, the 5 percent was no longer  
25 paid to the car salespeople at Hillside Auto

1 Ishaque Thanwalla

2 Outlet?

3 A. Jeanique had nothing to do with  
4 taking the 5 percent. It was my bonus and I  
5 used to give it based again on the day and  
6 the car and the week and the month. It all  
7 depended, so Jeanique had no power to give  
8 anybody anything, nor could she promise  
9 anything. No, it was me who did, who ran  
10 the dealership if that answers your question  
11 again.

12 Q. What was David Baron's position  
13 at Hillside Auto Outlet?

14 A. I answered that question  
15 previously, he was a percentage owner.

16 Q. What were his job  
17 responsibilities at Hillside Auto Outlet.

18 MR. KATAEV: Objection to  
19 the form. You can answer.

20 A. He had no responsibilities.

21 Q. How about Jory Baron, what were  
22 his responsibilities as a percentage owner?

23 MR. KATAEV: Objection to  
24 the form. You can answer.

25 A. No responsibilities.

1 Ishaque Thanwalla

2 Q. How about Josh Aaronson?

3 A. No responsibilities.

4 Q. We were talking about the  
5 DealerTrak system; did you at any time  
6 provide your username and password to  
7 Leticia Stidhum?

8 A. No, and I never will to any  
9 employee.

10 Q. Did you write a username and  
11 password on a Post-It note and pass it on to  
12 Leticia?

13 MR. KATAEV: Objection  
14 Asked and answered, but you  
15 can answer.

16 A. No.

17 Q. Have you ever personally trained  
18 Leticia on the DealerTrak system?

19 A. No.

20 Q. Did Andris Guzman have an  
21 account in the DealerTrak system?

22 A. Yes.

23 Q. When Andris Guzman had left  
24 Hillside Auto Outlet, was there a time when  
25 you told Leticia Stidhum that as the top

1 Ishaque Thanwalla

2 saleswoman, you would prefer her to run the  
3 DealerTrak system with her customers first?

4 A. No.

5 Q. Does Hillside Auto Outlet have  
6 any written policies regarding  
7 discrimination?

8 A. Whatever policy we have, we take  
9 a policy from corporate, and from the EDD we  
10 have it posted for the people, equal  
11 opportunity employment posters, the EDD  
12 employment. So, we do have posters posted  
13 in the lunchroom where we eat lunch.

14 Q. By ``corporate,`` what do you  
15 mean?

16 A. Meaning that we have posters for  
17 the employment for them to read and know  
18 what their rights are.

19 Q. You said you had written  
20 policies from corporate?

21 A. Yes. That is what corporate  
22 gives us, and things, they were payroll  
23 company is what I meant, actually. Payroll  
24 company provides ADP for us with all the  
25 posters and everything. Any updates come

1 Ishaque Thanwalla

2 in, we get it.

3 Q. Have you ever traveled outside  
4 the country in December of 2018?

5 A. Yes.

6 Q. Where did you travel to?

7 A. Back home, Pakistan.

8 Q. When did you travel outside of  
9 the United States?

10 A. In 2018; is that your question?

11 Q. Correct.

12 A. It's between, if I can recall, I  
13 usually leave on the 20th or the 21st or the  
14 22nd of December, and I usually come back  
15 between the 5th or the 7th. That is my  
16 usual trip every year except last year.

17 Q. Earlier you mentioned that the  
18 posters would be posted in the lunchroom.  
19 Can you describe where that was?

20 A. Posted, I have described to you  
21 the posters are posted in the lunchroom.  
22 What don't you understand?

23 Q. Where is the lunchroom within  
24 Hillside Auto Outlet?

25 A. There is a lunchroom right next



1 Ishaque Thanwalla  
2 to the finance office, my office and the  
3 hallway right outside there was a lunchroom.  
4 They can sit down, there are tables and  
5 stools and they can sit and eat their lunch  
6 and the microwave.

7 Q. Specifically in 2018, when did  
8 you travel to Pakistan?

9 A. I gave you an approximate which  
10 I mentioned to you earlier. I gave you an  
11 answer that it was about the 20th, the 21st,  
12 and probably back by the 6th or 7th, the  
13 5th, 6th or 7th. I am usually back then and  
14 I can't recall the exact date. But I can  
15 look into it and I can answer that question  
16 specifically.

17 MR. KATAEV: Can we take a  
18 five-minute break whenever  
19 you like?

20 MS. TROY: We just took a  
21 break. If you don't mind, I'm  
22 going to go for a little bit  
23 and then we will take that  
24 break if it's not a problem.

25 MR. KATAEV: Okay.

1 Ishaque Thanwalla

2 Q. Did you speak with anyone in  
3 preparation for today's deposition?

4 A. Do you mean about the case?  
5 Emmanuel, my attorney.

6 Q. Besides your attorney, did you  
7 speak with anyone else?

8 A. No.

9 MS. TROY: I'm going to  
10 ask the reporter to leave a  
11 blank space in the transcript  
12 for the date when Mr.  
13 Thanwalla traveled outside of  
14 the United States as well as  
15 a blank for the date when he  
16 returned to the United  
17 States.

18  
19 (insert)

20  
21 (insert)

22 Q. Mr. Thanwalla, you traveled to  
23 Pakistan; was that with a passport?

24 A. How else could I travel?

25 Q. In the weeks prior to your

1 Ishaque Thanwalla

2 traveling, were you out of Hillside Auto  
3 Outlet?

4 A. Can you repeat your question one  
5 more time, please? I didn't hear it right.

6 Q. Sure. I'm asking you if the  
7 week before you traveled physically outside  
8 of the United States, if you worked outside  
9 of Hillside Auto Outlet, where you are not  
10 working at Hillside Auto Outlet during the  
11 week before.

12 A. I worked until the last day  
13 before I leave. So, the answer to that is  
14 no, I was working until the last day before  
15 I left.

16 Q. Until the last day before you  
17 left, were you there from the start of the  
18 day until the end of the day, every day, in  
19 Hillside Auto Outlet?

20 A. Before I left, was that the  
21 question?

22 Q. Right, before you left.

23 A. Let's say if I left on a  
24 Saturday, correct? Yes, I would be working  
25 Friday from the morning until evening, to

1 Ishaque Thanwalla  
2 give you a complete understanding. So, if I  
3 was supposed to be leaving around on a  
4 Saturday, yes, I would work Wednesday,  
5 Thursday, Friday, and through the morning of  
6 the day until Friday until Saturday, not for  
7 the afternoon. So, I would not come to work  
8 on that day. Does that answer your  
9 question?

10 Q. Was it your practice to  
11 interview every single employee for Hillside  
12 Auto Outlet?

13 A. In my what?

14 Q. In your practice.

15 A. I do try my best to interview  
16 everyone because I am the one who is hiring  
17 and I am the only one who is firing.

18 Q. I'm going to show you a document  
19 on the screen.

20 MS. TROY: Ms. Court  
21 reporter, can you mark this  
22 as Plaintiff's Exhibit 2?  
23 (Plaintiff's Exhibit 2 marked  
24 for identification)

25 The entire document will just be

1 Ishaque Thanwalla  
2 marked as Plaintiff's Exhibit 2 and I  
3 will be referring to different pages  
4 when I speak to Mr. Thanwalla.

5 Q. Mr. Thanwalla, do you see a  
6 document that was Defendant's Document  
7 Production, D1186. On it, it says the hire  
8 date was May 22nd of 2018, and the  
9 termination date was January 14th, 2019.  
10 Does this refresh your recollection as to  
11 when Leticia started?

12 A. If the document says it, I am  
13 looking at it most likely, yes.

14 Q. How about the end date?

15 A. The end date may be a little --  
16 it says again, to the best of my  
17 recollection, it looks like Leticia quit her  
18 job, left to the other company.

19 Q. Just to clarify, the document  
20 says January 14th, of 2019. You are saying -  
21 -

22 A. Best of my ability. I said I  
23 can't recall, I still can't recall. She  
24 came to my office and she said she's going  
25 to go with Ali to the other dealership and

1 Ishaque Thanwalla

2 that was in the afternoon time when she  
3 left.

4 MS. TROY: We can now take  
5 a short break for five  
6 minutes and come back at  
7 11:35. It is now 11:30 per  
8 Manuel's request.

9 (A recess was taken from  
10 11:30 a.m. until 11:35 a.m.)

11 THE WITNESS: Welcome  
12 back.

13 MS. TROY: No need to  
14 welcome me back. When we are  
15 doing the deposition, if you  
16 don't mind, please don't talk  
17 to me. The Troy's are  
18 straightshooters and we don't  
19 do that to anyone, we don't  
20 welcome back anyone, we just  
21 do our jobs.

22 Q. Are you familiar with an  
23 employee for Hillside Auto Outlet whose name  
24 is Lilly?

25 A. Yes.

1 Ishaque Thanwalla

2 Q. How are you familiar with her?

3 A. She was my DMV clerk.

4 Q. Do you remember from what date  
5 to what date she worked for Hillside Auto  
6 Outlet?

7 A. I cannot.

8 Q. Do you recall from what year she  
9 began working at Hillside Auto Outlet?

10 A. Can you repeat the question one  
11 more time?

12 Q. Sure. Do you recall what year  
13 she began working at Hillside Auto Outlet?

14 A. I believe it's 2018, if I'm not  
15 wrong, but I may be wrong.

16 Q. At the time when Lilly left  
17 Hillside Auto Outlet, was she pregnant?

18 A. Was she pregnant when she worked  
19 for me? She was pregnant when she left, she  
20 was pregnant.

21 Q. Did she quit or did she get  
22 fired from Hillside Auto Outlet?

23 A. Well, let me answer this  
24 question in a way where everybody can  
25 understand what happened. When she left,

1 Ishaque Thanwalla

2 she was doing the DMV paperwork, and the DMV  
3 is a crucial business. We have to register  
4 the car within 5 days and it was a couple of  
5 deals that were not registered. I  
6 disciplined her to say ``why aren't these  
7 registered? There was no registration that  
8 was performed. What is the reason behind  
9 it?'' She didn't like me disciplining her  
10 because I don't want to lose my license to  
11 do business. So, she didn't like my  
12 disciplining her and she left.

13 Q. When she left, did she say  
14 anything to you at the dealership?

15 A. Not really, not that I can  
16 recall.

17 Q. Did Lilly leave upset?

18 A. I cannot answer that question  
19 because I don't--- I can't recall. You  
20 can't have anyone jeopardizing your license  
21 in your industry. I won't have anybody  
22 jeopardizing my license. So, if I  
23 discipline someone to tell them how to  
24 perform their job the right way, how to  
25 finish the job, it's nothing wrong with



1 Ishaque Thanwalla

2 that. I will tell them that they needed to  
3 finish this for us to have our license in  
4 place. If they're not going to do that,  
5 it's not fair to me.

6 Q. Did Lilly complain that she was  
7 getting fired because she was pregnant?

8 A. Never.

9 Q. Do you know how many months'  
10 pregnant she was when she left?

11 A. When she started, when I  
12 answered the question, she was pregnant.  
13 When she left, she was pregnant and I can't  
14 answer that question.

15 MR. KATAEV: Objection as  
16 to relevance and to this  
17 entire line of questioning.  
18 She is not a plaintiff in  
19 this case.

20 Q. What is Lilly's last name?

21 A. I can't recall because you can  
22 see I can't remember Jeanique's last name  
23 and I can't remember a lot of people's last  
24 name. I don't even remember Leticia's last  
25 name.

1 Ishaque Thanwalla

2 MS. TROY: I'm going to  
3 leave a blank in the  
4 transcript for you to fill  
5 that in.

6  
7 (insert).

8 A. --

9 MR. KATAEV: There is no  
10 question pending.

11 Q. At the time of her termination,  
12 what was Lilly's schedule?

13 MR. KATAEV: Objection as  
14 to relevance. You can answer.

15 A. She was a part-timer, she worked  
16 part-time for the DMV work.

17 Q. At the time that she was fired,  
18 how many months had she worked for Hillside  
19 Auto Outlet?

20 MR. KATAEV: Objection,  
21 same objection.

22 A. She was not fired, she quit on  
23 her own.

24 Q. At that time, how many months  
25 had she worked for Hillside Auto Outlet?

1 Ishaque Thanwalla

2 A. I can't answer that question, I  
3 cannot recall. When she started, like I  
4 said, she was pregnant and she left, she was  
5 pregnant.

6 Q. You mentioned disciplining her;  
7 are there any records?

8 A. There should be a record, like I  
9 said, we had a robbery.

10 Q. Your contention is that the  
11 records were stolen?

12 A. I am not -- I cannot answer that  
13 question.

14 Q. You cannot answer the question  
15 because you don't know?

16 A. I don't know. Thank you.

17 Q. Just to be clear, we are talking  
18 about one robbery or multiple robberies?

19 A. One robbery.

20 Q. During that robbery, were any  
21 electronics stolen?

22 A. I think so, but I'm not sure.

23 Q. In addition to the electronics,  
24 were a few hundred dollars also stolen?

25 A. I think so, but I'm not sure. A

1 Ishaque Thanwalla

2 lot of paperwork was gone and scattered.

3 Q. At the time of the robbery or  
4 soon thereafter, did you and Leticia  
5 together review the surveillance?

6 A. Yes.

7 Q. Did Leticia identify the robber  
8 as someone who worked for you?

9 A. Yes.

10 Q. Do you recall if the  
11 surveillance video showed the robber taking  
12 any documents?

13 A. Robbers taking -- the robber,  
14 the way I can describe it is when he was  
15 inside, he did not get the caption that's  
16 what he said when he was going out.

17 Q. Do you still have surveillance  
18 video?

19 A. I think so, but I'm not sure.  
20 Maybe, maybe, but I can't answer that  
21 question. I don't know if our surveillance  
22 goes that far back. I think you only keep  
23 the records for 30 days,

24 Q. At the time when you and Leticia  
25 were reviewing the surveillance video, did

1 Ishaque Thanwalla

2 you send a copy of that video to your  
3 attorney?

4 A. I think that she sent it to me,  
5 probably.

6 Q. What phone were you using at the  
7 time; was it an iPhone, an Android, what was  
8 it?

9 A. A different phone than this  
10 iPhone, yes.

11 Q. You mentioned different phones,  
12 how many times have you changed your phone  
13 since the robbery?

14 A. One or two times, if I can  
15 recall.

16 Q. Each time did you change to  
17 another iPhone?

18 A. Yes.

19 Q. Did you back up your data using  
20 the iCloud?

21 A. I have no idea how to do that.

22 Q. Did someone back it up for you?

23 A. I can't answer that question  
24 because I don't know.

25 Q. Do you still have any text

1 Ishaque Thanwalla

2 messages that you had with Leticia?

3 A. Yes.

4 Q. Just to be clear, the text  
5 messages that you have with her, was that on  
6 a regular text message or was it on another  
7 app?

8 A. There were multiple apps, one  
9 was the regular text message and one was  
10 WhatsApp.

11 Q. You texted with her on both the  
12 regular text message, as well as the  
13 WhatsApp?

14 A. Yes. When I am back home in  
15 Pakistan, when I left, like I said the 20th  
16 or the 21st of 2018 and I came back on  
17 January 5th and 7th, she frequently texted  
18 me on WhatsApp, I had communications with  
19 her, as well as other employees on the  
20 WhatsApp channel.

21 Q. You don't have those text  
22 messages?

23 A. Yes, I do.

24 Q. In addition to the regular text  
25 messages and WhatsApp, do you have any other

1 Ishaque Thanwalla  
2 records of your communications with Leticia  
3 Stidhum?

4 A. May be available on my email. I  
5 can't recall. 100 percent.

6 MS. TROY: Demand number 1  
7 is for the text messages  
8 between Ishaque Thanwalla and  
9 Stidhum.

10 Demand number 2 is for the  
11 WhatsApp messages between  
12 Thanwalla and Leticia.

13 Demand number 3 is for  
14 the email exchanges between  
15 Ishaque Thanwalla and  
16 Stidhum. The timeframe is  
17 between September of 2018 --  
18 actually, let's backtrack.  
19 It's from November of 2018  
20 through January of 2019.

21 Q. Mr. Thanwalla, what was your  
22 phone number at the time?

23 A. Same number as today. It is 661-  
24 886-8012.

25 Q. Who is your service provider?

1 Ishaque Thanwalla

2 A. Verizon.

3 Q. What'sApp, did you sign up using  
4 your phone number?

5 A. Correct.

6 Q. The emails that you mentioned,  
7 is that your work email or is that some  
8 other email address?

9 A. My work email. To be clear, I  
10 do have a Hillside Auto Outlet computer, and  
11 it's I-S-H-A-Q-U-E@hillsideautooutlet.com.

12 Q. Please if you don't mind, just  
13 confirming that that is the correct email  
14 address?

15 (The witness complies)

16 MR. KATAEV: Let the  
17 record reflect that  
18 plaintiff's counsel typed in  
19 I-S-H-A-Q-  
20 E@hillsideoutlet.com on the  
21 chat.

22 THE WITNESS: Yes.

23 Q. Besides using your work email,  
24 did you communicate with Leticia using any  
25 other email?



1 Ishaque Thanwalla

2 A. No.

3 Q. In the video that we were  
4 talking about earlier, was that sent to you  
5 from Leticia using text message, WhatsApp or  
6 email?

7 A. I can't answer that, I don't  
8 recall that. That's why I can't answer that  
9 question.

10 MS. TROY: Demand number 4  
11 for the surveillance footage.

12 Demand number 5 is for the  
13 police report, both of which  
14 concerns the robbery that  
15 took place at Hillside Auto  
16 Outlet. The witness does not  
17 recall the timeframe, but the  
18 year should be in the year of  
19 2018.

20 MR. KATAEV: Please  
21 follow-up in writing with all  
22 of your requests. Thank you.

23 Q. Before the break I showed you a  
24 WhatsApp and the start date and the end date  
25 of Leticia Stidhum. What was Leticia

1 Ishaque Thanwalla

2 Stidhum's position at Hillside Auto Outlet?

3 A. Her position was commission  
4 salesperson.

5 Q. As the commission salesperson,  
6 what were her responsibilities?

7 A. I answered that question prior,  
8 but I will answer it again for you. To show  
9 customers the car, meet and greet, show them  
10 the car and take a credit application and  
11 take documentation. That was her  
12 responsibility.

13 Q. Did she ever run the credit  
14 herself?

15 A. No.

16 Q. Earlier you mentioned that you  
17 trained her, what did you train her in?

18 A. How to sell cars; how to meet  
19 and greet; how to show them a car; how to  
20 take a credit application; how to use a V-I-  
21 N Solution.

22 Q. Can you describe for me what you  
23 mean by how to take credit?

24 A. How to take a credit  
25 application, you take the application

1 Ishaque Thanwalla

2 whether it's manual or you are welcome to  
3 take an application on the Vin V-I-N  
4 solutions that they did that sometimes.  
5 Sometimes they do not, but if you take a  
6 manual application, you use the block  
7 letters so that you could read it and it's  
8 legible.

9 So, you have first name, last name,  
10 driver's license of customer to make sure  
11 you are correctly doing it the right way,  
12 date of birth, social security and their  
13 employment information, their resident  
14 information. You take a simple credit  
15 application and make sure that they sign the  
16 credit application.

17 Q. Was Leticia ever given  
18 additional responsibilities apart from her  
19 position as a commission salesperson?

20 A. No.

21 Q. Did you, at any point during  
22 Leticia's employment with Hillside Auto  
23 Outlet, did you ever talk to her about  
24 promoting her to a sales manager position?

25 A. Never.

1 Ishaque Thanwalla

2 Q. Did you promise her any  
3 promotion?

4 A. Never.

5 Q. Did you ever tell her that you  
6 were traveling to Pakistan, so the  
7 discussion about the promotion will wait  
8 until you came back to the United States?

9 A. I never discussed with her any  
10 promotions. What I can recall in her  
11 deposition, she mentioned that I promised  
12 her a promotion. She had no right, maybe it  
13 was at Ali, maybe he was playing with her  
14 head. No right to promotion, so that he  
15 could recruit her if he had another job,  
16 which he did. You can see on the WhatsApp  
17 she was going with Ali after the job, but I  
18 never did. He was playing with her mind.

19 Q. Did Leticia ever complain to you  
20 about her pay?

21 A. Never. She mentioned that she  
22 always made more money than she ever made in  
23 her life, so she was very happy. You can  
24 see the text messages and you would see the  
25 WhatsApp messages.

1 Ishaque Thanwalla

2 Q. How would you describe your  
3 relationship with Leticia during her  
4 employment at Hillside Auto Outlet?

5 A. I treated every employee like my  
6 family. Like she mentioned, the dad of  
7 Hillside Auto Outlet. I was the dad of  
8 Hillside Auto Outlet, she respected me and I  
9 respected her.

10 Q. Would it be fair to say that  
11 your relationship was quite close?

12 A. I have close relationships with  
13 all my employees. I am a very caring person  
14 and I respect and I love. That's the only  
15 way that I treat my employees.

16 Q. Earlier you mentioned that Ali  
17 was promising her a promotion. What do you  
18 mean, can you describe exactly what you were  
19 talking about?

20 A. When Emanuel (indicating) was  
21 taking the deposition from Leticia, she is  
22 the one who answered that Ali promised her  
23 the promotion, not me. I never did, she  
24 wasn't there to be promoted. She needed a  
25 lot more experience to be promoted as a

1 Ishaque Thanwalla

2 sales manager, assistant sales manager to  
3 me. Although, she was a good salesperson  
4 and that's the best I can tell you.

5 Q. What is the difference between  
6 an assistant manager and a sales manager, or  
7 was that the same position?

8 A. It was the same position. It is  
9 the same to me, my sales manager, because  
10 the general manager to me, they are my  
11 assistants. One thing I learned, I kept my  
12 office right next to my manager so that I  
13 could hear what was going on.

14 Q. To be clear, did you also  
15 consider the finance manager as an assistant  
16 manager?

17 A. Finance manager is my assistant  
18 manager. But, they are recognized as the  
19 ``finance manager`` because they are the ones  
20 who are dealing with the banks.

21 Q. When you talked earlier that you  
22 had two assistant managers, did you mean two  
23 sales managers or one sales manager and one  
24 finance manager?

25 A. Let me just answer that question

1 Ishaque Thanwalla

2 the right way. That's so you do not re-  
3 question me again. I had Jeanique as my  
4 assistant manager, and I had Guzman as my  
5 assistant manager, I had Serge as my finance  
6 manager, and I have Louis as my finance  
7 manager. Do you understand clearly?

8 Q. Do you not consider the finance  
9 manager as the assistant manager?

10 A. They are assistants, it's --  
11 they are different divisions, but they are  
12 still assistants to me.

13 Q. Is it fair to say that Leticia  
14 has left Hillside Auto Outlet, she left in  
15 November of 2018, December of 2018, in that  
16 timeframe?

17 A. I can't recall so I cannot  
18 answer that question.

19 Q. You were saying that Ali  
20 promised her the promotion. Was that  
21 promotion at Hillside Auto Outlet?

22 A. You asked me, and it was in her  
23 deposition that she said it. I am only  
24 repeating what she answered the question  
25 that Emanuel asked her that question. I am

1 Ishaque Thanwalla

2 just going and referring to that. I am not  
3 referring to anything else. Do you  
4 understand?

5 Q. So, you don't have any personal  
6 knowledge about any promotions whatsoever;  
7 is that correct?

8 A. The last time that Emanuel was  
9 taking the deposition from her.

10 Q. Have you ever been arrested for  
11 any reason before?

12 A. Yes.

13 Q. What were you convicted of  
14 before?

15 A. I was mixed up and it was  
16 cleared and it was expunged. It was over 15  
17 years ago.

18 Q. You mentioned it was over 15  
19 years ago, was that the same as the  
20 immigration case or different?

21 A. I can't recall honestly, I  
22 cannot recall.

23 Q. Do you have any other names  
24 besides Ishaque?

25 A. I use Isaac or Abraham, Isaac I-



1 Ishaque Thanwalla

2 S-A-A-C or Ivraham I-V-R-A-H-A-M. I use  
3 Abraham A-B-R-A-H-A-M on my business cards  
4 just to clarify.

5 Q. Is Abraham the last name or is  
6 that part of the first name?

7 A. I used Abraham, that was my  
8 father's first name. I don't have a middle  
9 initial except it's just Thanwalla.

10 Q. Please take a look at the screen  
11 again and we're going to look at the sales  
12 log.

13 THE WITNESS: This is --

14 MR. KATAEV: There is no  
15 question pending.

16 Q. Mr. Thanwalla, on the screen  
17 here we are still on Plaintiff's Exhibit 2.  
18 Do you see documents identified as D002 to  
19 D067; is that the sales log, if you  
20 recognize this document?

21 A. Yes.

22 Q. Were you the one who created  
23 this report?

24 A. This was created -- this report,  
25 yes.

1 Ishaque Thanwalla

2 Q. To your knowledge, let's start  
3 from page 1, to your knowledge, are the  
4 number of cars sold on the sold log  
5 accurate?

6 A. Not to the best of my ability,  
7 no.

8 Q. To your knowledge, does this  
9 understate the number of cars sold by the  
10 company?

11 MR. KATAEV: Objection to  
12 the form. You can answer.

13 A. Sometimes they are correct and  
14 sometimes they are not correct, because that  
15 is called an ``manual entry.'' So, if my  
16 assistant has manually entered it or my  
17 salesperson like Leticia had entered it as  
18 sold, she had permission in her own name.  
19 I just want to add to my answer because the  
20 only person that is salesperson is only  
21 allowed to see her or his records only.  
22 They cannot see anybody else's. If they put  
23 it in the -- if the customer came in, they  
24 could say that ``the customer came in and is  
25 present on the lot. The customer sold -  
\_``

1 Ishaque Thanwalla  
2 they can push the button inside and say  
3 ``sold.'' It's a salesperson can do that as  
4 well as my assistant managers can do that,  
5 which is my sales managers.

6 Q. I'm going to show you a  
7 different month for the sold log. It is on  
8 the screen. My question for you remains the  
9 same which is: whether or not the sold log  
10 understates for each of the months that I  
11 show you the true number of cars sold.

12 We're going to start from May of 2018  
13 and we are still on page 2 of the exhibit  
14 which also corresponds to defendant's  
15 production 32. This is from May of 2018.  
16 The car sold are listed as 46.

17 A. My answer is the same exact, and  
18 I can't answer that. It looks like 100  
19 percent understated, that means 4 or 6 may  
20 be understated or maybe it's incorrect.  
21 Maybe it was sold, I can't answer based on  
22 these records.

23 Q. I am now showing you page 10 for  
24 June of 2018; is your answer the same?

25 A. Yes.

1 Ishaque Thanwalla

2 Q. For the record, we are on page  
3 10, which corresponds to defendant's  
4 document production 10.

5 Now we are on page 19 which corresponds  
6 to defendant's document production number  
7 19. Same question for you, this shows the  
8 sold log for the month of July of 2018. Same  
9 question.

10 A. I would say so, yes. Whatever I  
11 answered previously, this is the exact  
12 number. It could be more or less, it all  
13 depends. These were on this log and the  
14 salesman can do it as well as the assistant  
15 manager can do it. That's why they are not  
16 100 percent.

17 Q. Now we are on page 28 of exhibit  
18 2 which corresponds to defendant's  
19 production 28. My question for you is the  
20 same, and it's for the month of August of  
21 2018.

22 A. My answer is the same.

23 Q. We are on page 37 which  
24 corresponds to defendant's document  
25 production 37. It is for the month of

1 Ishaque Thanwalla

2 September of 2018, is your answer the same?

3 A. Yes.

4 Q. Page 45 now, which corresponds  
5 to defendant's document production 45. Is  
6 your answer that it covers the month of  
7 October of 2018, is your answer the same?

8 A. Yes.

9 Q. Page 52, which corresponds to  
10 defendant's document production 52 and  
11 covers the month of November of 2018; is  
12 your answer the same answer?

13 A. Yes.

14 Q. We are on now page 62 which  
15 covers the month of December of 2018. It  
16 also corresponds with defendant's document  
17 production 62; is your answer the same?

18 A. Yes.

19 Q. Next, I'm going to show you  
20 starting from page 1251 which is a list of  
21 comparatorS. C-O-M-P-A-R-A-T-O-R-S.

22 We are on page 1251 which corresponds  
23 with defendant's document production 1251.  
24 My question to you is, can you describe for  
25 me what the department code means?

1 Ishaque Thanwalla

2 A. Department codes are the  
3 department codes.

4 Q. I'm asking about right here, the  
5 ``department codes.``

6 A. Okay.

7 Q. For the record, I am just  
8 highlighting the L-O-C/D-E-P-T.

9 A. That is the department code, the  
10 company code. The company code may be  
11 provided by an ADP company, local  
12 department.

13 Q. Do you know who this individual  
14 is that is identified as individual 21?

15 A. I don't know. I don't  
16 understand your question. Please repeat it.

17 Q. Do you know this individual that  
18 was paid \$2,500 per week, do you know who  
19 that is?

20 A. Who is paid LOC department, I  
21 can't answer that because I can't recall who  
22 it was.

23 Q. Is it fair to say that no car  
24 salesperson was paid \$2,500 a week?

25 A. No.

1 Ishaque Thanwalla

2 MS. TROY: Can you read  
3 back the last question and  
4 answer?

5 (The reporter read back the  
6 last question and answer)

7 A. The question is no, yes. The  
8 question is fair.

9 Q. We are now on page 1252 which  
10 corresponds with defendant's document  
11 production 1252. I am going forward with  
12 the page numbers and they correspond with  
13 defendant's document production numbers.  
14 So this individual has a department code of  
15 7. Do you know what that means?

16 A. No.

17 Q. This person was paid \$650 on a  
18 weekly basis, correct?

19 A. I can't answer that question.  
20 It could be anybody else and I can't answer  
21 that. I don't know the codes, and that is  
22 what is paid, the payroll is paid to whom.

23 Q. Is it fair to say that this  
24 individual is not a car salesperson?

25 A. I can't answer that question

1 Ishaque Thanwalla

2 because I don't know.

3 Q. For the record, there is an  
4 individual number 22 on page 1254. I will  
5 note for the record that the ``loc department  
6 is 200,`` for the L-O-C/departments, and there  
7 is no individual that is regularly receiving  
8 \$350. Do you know if this person is a car  
9 salesperson?

10 A. I can't answer that question, I  
11 don't know.

12 Q. Besides car salespeople, were  
13 there any other individuals --

14 A. Yes.

15 MS. TROY: I did not  
16 finish my question.

17 MR. KATAEV: Please let  
18 Ms. Troy finish her question  
19 before you answer.

20 Q. (Continuing) ---within the  
21 Hillside Auto Outlet who were paid  
22 commissions?

23 A. Like I said, anybody else was  
24 paid commissions besides the salesperson, is  
25 that your question?



1 Ishaque Thanwalla

2 Q. Correct.

3 A. I don't understand your  
4 question.

5 Q. Were there any other positions  
6 or individuals who were paid commission in  
7 addition to the car salespeople?

8 A. The finance manager, which is my  
9 assistant, the sales manager, which is my  
10 assistant, yes.

11 Q. Anyone else?

12 A. Not that I know, not to my  
13 knowledge.

14 Q. Were the porters paid any  
15 commission?

16 A. They got bonuses, but not --

17 Q. How about the BDC employees did  
18 they receive a commission?

19 A. This is the Business Development  
20 Center, is that's what you're referring to?

21 Q. Yes, did they receive a  
22 commission?

23 A. BDC, the Business Development  
24 Center, if that's what you are referring to?

25 Q. Right. Did they receive a

1 Ishaque Thanwalla

2 commission?

3 A. Yes.

4 Q. Did anyone else, did the  
5 finance and sales managers and members of  
6 the BDC receive a commission?

7 A. I cannot answer that because I  
8 don't remember everything, that is why.

9 Q. Were the BDC employees' base pay  
10 similar to that of the salespeople meaning  
11 300, around \$300 base pay weekly salary plus  
12 the commission or something else?

13 A. I understand that every  
14 department has a manager, every department  
15 has salespeople and they were all  
16 commissioned salespersons. One was a  
17 salesperson, one was a telephone  
18 salesperson. The BDC, they answered the  
19 phone and they worked the BDC phone, the  
20 salespeople. They brought the people in and  
21 they got paid accordingly too.

22 Q. Are they also paid a \$300 weekly  
23 salary plus a flat commission, the 150 per  
24 car, or was that arrangement different in  
25 that department?

1 Ishaque Thanwalla

2 A. To my knowledge, the arrangement  
3 was different, to the best of my ability and  
4 the best of my knowledge.

5 Q. So, the individual identified as  
6 2, he was paid \$350 flat weekly for the  
7 regular pay. What position did this  
8 individual have?

9 A. I can't answer that because I  
10 don't know. It could be sales or it could  
11 be the BDC or finance, I can't answer that  
12 question.

13 Q. We are now on page 1255 and the  
14 individual is identified as number 23. The  
15 department as listed as 100. Is it fair to  
16 say that this individual does not work in  
17 sales?

18 A. I cannot answer that question.  
19 How would I know? How would I know by  
20 looking at the pay stub?

21 Q. Who directed the production of  
22 these earning statements?

23 A. What do you mean by that  
24 exactly? Please elaborate on the question.

25 Q. Earlier when I asked you if you

1 Ishaque Thanwalla  
2 had a role in the preparation of this log  
3 you mentioned that you directed that this  
4 log be produced. My question is similar,  
5 but do you know who directed the production  
6 of the earning statements?

7 A. I'm still confused by the  
8 question. Let me understand this -- can you  
9 tell me differently? You were telling me  
10 who made people's salary when they were  
11 going to get paid, is that your question?

12 Q. Who had the earning statements  
13 produced, meaning who asked for the earning  
14 statements to be compiled and produced to us  
15 and for the Judge?

16 Who requested it to be printed and  
17 provided to the Judge and to us within the  
18 Hillside Auto Outlet Company?

19 A. I did.

20 Q. When you asked for the earning  
21 statements to be produced, did you list them  
22 by position or did you have the earning  
23 statements for all employees implemented?

24 A. To the best of my ability, I  
25 think all employees.

1 Ishaque Thanwalla

2 MR. KATAEV: I will just  
3 represent for the record that  
4 I believe following June 20  
5 of '21 the initial conference  
6 before Magistrate Judge Mann,  
7 these are items were  
8 requested for settlement  
9 purposes as this was a  
10 settlement conference. I can  
11 represent to you that we  
12 worked off of the transcript  
13 in order to prepare the  
14 production.

15 Q. To clarify, Mr. Thanwalla,  
16 during the conference it was asked for, the  
17 comparator to Ms. Stidhum, correct?

18 To the best of your knowledge, were the  
19 earnings records of only the sales  
20 department produced or was it for all the  
21 employees just so that we can get it clear  
22 on the record?

23 MR. KATAEV: Objection.  
24 Asked and answered, but you  
25 can answer the question.

1 Ishaque Thanwalla

2 A. If I am not wrong, I think to  
3 the best of my ability,y it was all the  
4 employees.

5 Q. Looking at individual 23, it is  
6 listed for \$1,825 and the year to date for  
7 2018 \$150, is it accurate to say that no  
8 cars salesperson worked at Hillside Auto  
9 Outlet and did not receive a commission?

10 A. I don't understand your  
11 question. Please, can you make it a little  
12 bit more simple for me?

13 Q. Sure. Are there any non-  
14 commission car salespeople at Hillside Auto  
15 Outlet?

16 A. No, there is nobody having to do  
17 with the sales department -- all of the  
18 people having to do with the sales  
19 department have commission.

20 Q. Is it accurate to say to the  
21 extent that the pay stub reflected that this  
22 individual did not receive any commission,  
23 that that individual was not a car  
24 salesperson?

25 A. I can't answer that question.

1 Ishaque Thanwalla

2 Q. Do you know who could?

3 A. We have to look into it.

4 Q. Who would you ask?

5 A. You would ask the controller to  
6 figure that out and ask them, the accountant  
7 to look at it.

8 Q. Turning your intention to  
9 individual 7 on page 1256, it says that the  
10 ``Reg`` is \$200. Do you know what position  
11 that person was in?

12 A. I don't know.

13 Q. How about this individual  
14 (indicating)

15 A. Do not know.

16 Q. That was page 1257 individual  
17 number 24.

18 Besides the car salespeople, who else  
19 was paid 2 paychecks by Hillside Auto Outlet  
20 on a weekly basis?

21 MR. KATAEV: Objection to  
22 the form. You can answer.

23 A. I can't recall. Maybe BDC and  
24 finance, and the managers possibly.

25 Q. In other words, all of the

1 Ishaque Thanwalla

2 commission employees received 2 paychecks;

3 is that correct?

4 A. Correct, and some got paid once  
5 a month commission.

6 Q. Is it fair to say that any  
7 employees who did not receive two paychecks  
8 were not car salespeople?

9 A. Again, I don't understand your  
10 question. Can you repeat it one more time?

11 MS. TROY: Sure. Ms.

12 Reporter, can you read back  
13 the last question for the  
14 witness.

15 (The reporter read back the  
16 last question)

17 A. I cannot answer that question  
18 because I don't know. I can't recall,  
19 actually.

20 Q. The same question for the  
21 individual on page 1258. The REG wage  
22 straight is set at \$500. Do you know who  
23 this person is or what this person's  
24 position is?

25 A. I can't recall.



1 Ishaque Thanwalla

2 Q. Page 1259, individual 13. The  
3 regular weekly wage rate is \$600; who is  
4 this individual or what was this  
5 individual's position?

6 A. I can't recall. I don't know  
7 who.

8 Q. Is there any individual for whom  
9 you can tell what the position is by looking  
10 at the pay stubs?

11 A. No. Everybody has a different  
12 structure.

13 Q. We're going to go through a  
14 couple of other pages and my question for  
15 you remains the same: that is, are you able  
16 to identify the individual based on the pay  
17 stub, what that individual's name is or  
18 their position?

19 We are on page 1260 for individual 3 and  
20 the regular rate is listed at \$600.

21 A. I can't answer that question  
22 because I can't recall who that would be.  
23 Same thing, same pay stub you are showing me  
24 and I would say the same.

25 MS. TROY: For the record,

1 Ishaque Thanwalla

2 that was page 1261 individual

3 25.

4 Q. We are now on page 1262

5 individual 17. Do you recognize this

6 individual or this person's position?

7 A. No.

8 Q. Did you say ``no'' for the last

9 question?

10 A. I did.

11 Q. Now we are on 1263, individual

12 number 26. Do you recognize this individual

13 or this individual's position based on the

14 pay stub?

15 A. No.

16 Q. Page 1264 individual number 27,

17 do you recognize this individual or this

18 individual's position based upon the pay

19 stub?

20 A. No.

21 Q. There is an individual 28 on

22 page 1265, same question.

23 A. No.

24 Q. Page 1266 individual number 29,

25 same question.

1 Ishaque Thanwalla

2 A. No.

3 Q. Individual 20 on page 1267, same  
4 question.

5 A. No.

6 Q. Individual 30 on page 1268, same  
7 question.

8 A. No.

9 MR. KATAEV: Please let me  
10 know when you are done with  
11 this line of questioning so  
12 we can take a break.

13 Q. We are now on page 1277 and the  
14 individual is 31. Do you recognize this  
15 individual or this person's position based  
16 upon the pay stub?

17 A. No.

18 Q. We are on 1296 individual number  
19 32, do you recognize this individual based  
20 upon the pay stub? For the record, it  
21 appears that this individual was hired on  
22 December 4th of 2018 and then paid \$1,000  
23 per week with no commission.

24 A. No.

25 Q. Was anyone paid \$1,000 per week

1 Ishaque Thanwalla

2 salary in the month of December of 2018?

3 A. Its same, it may be a draw, that  
4 may be a draw, possibly. It may be a draw  
5 against commission, maybe, but I can't  
6 recall. I don't know who it is.

7 Q. Did you hire anyone in December  
8 of 2018?

9 A. I hired a lot of people and I  
10 can't answer who I hired. I cannot say  
11 anything.

12 Q. Who was paid \$1,000 per week  
13 upon hire with no commission at Hillside  
14 Auto Outlet?

15 MR. KATAEV: Objection as  
16 to relevance. You can  
17 answer.

18 A. I answered ``no. I don't know.  
19 I cannot recall.''

20 Q. We are now on page 1320 for  
21 individual number 34. This individual was a  
22 newly hired person in December of 2018 and  
23 this individual was paid a regular weekly  
24 rate of \$900. Do you know who this  
25 individual is?

1 Ishaque Thanwalla

2 A. By me looking at the pay stubs,  
3 I can't recall who it is, what it is or what  
4 department, even though you are showing me  
5 the loc and department. I don't know the  
6 local department. So, no.

7 Q. We are now on page 3038 for  
8 individual 18. Do you know who this  
9 individual is and what that person's  
10 position is?

11 A. No.

12 Q. Would you be able to find out?

13 A. I have to refer to my office and  
14 find out, sure.

15 Q. Would you be able to tell me  
16 what that person's position is?

17 A. When I look into it, I will be  
18 able to answer the question.

19 MS. TROY: All right.

20 Demand number 6 will be for  
21 the name as well as the  
22 position for each of the  
23 individuals who the witness  
24 identified as numbers 21, 22,  
25 2, 23, 24, 4, 13, 3, 25, 17,

1 Ishaque Thanwalla

2 26, 27, 28, 29, 20, 30, 31,  
3 32, 33, 34, 18, 19, 35, 36,  
4 38, 39, and 37.

5 I know that they are out of  
6 order, but that is the order in  
7 which the documents presented  
8 themselves. My request is for  
9 the positions as well as the  
10 name for each of the individuals  
11 that are listed here that you  
12 produced, apparently as  
13 comparator to the plaintiff.

14 MR. KATAEV: Please put  
15 all of your requests in  
16 writing. We object to any  
17 characterization.

18 MS. TROY: Manuel, based  
19 upon your characterization of  
20 the record -- let's just  
21 continue.

22 Q. Going to page 1269, Mr.  
23 Thanwalla, do you see on page 69 for the  
24 period of November 27th of 2018 through  
25 December 3rd of 2018 there is a commission

1 Ishaque Thanwalla

2 listed for \$1,600?

3 A. Okay.

4 Q. Based on that \$1,600 figure, how  
5 many cars were sold?

6 MR. KATAEV: Objection.

7 You can answer the question.

8 A. 150 divided by 1600. Do you  
9 have a calculator?

10 Q. The formula is sufficient. Thank  
11 you.

12 To your knowledge, is that always an  
13 exact number?

14 A. Like I said previously, there is  
15 a flat rate commission and I answered that  
16 prior. I said there is a bonus, and the  
17 bonus and commission. So, maybe there is a  
18 commission, there is a bonus in there, 5  
19 percent bonus, it may be \$50 bonus or \$200  
20 bonus. I cannot answer that question  
21 because the commission plus the weekly  
22 bonus, a monthly bonus, I have no idea what  
23 is involved.

24 Q. What was the flat rate  
25 commission, meaning the \$150 per car versus

1 Ishaque Thanwalla

2 what the bonus was at Hillside Auto Outlet?

3 A. You can take 15, whatever the is  
4 amount is, let's take 10 cars would be  
5 \$1,500. Am I right? It would be plus a  
6 dollar bonus on top of that, and maybe that  
7 was only 8 cars and the rest was bonus. I  
8 can't answer that.

9 Q. My question is different. My  
10 question is: were there records kept as to  
11 what portion of the commission is the flat  
12 rate commission versus the bonus that you  
13 were talking about?

14 MR. KATAEV: Objection.

15 Asked and answered again.

16 A. May be a portion, possible, but  
17 I can't answer that

18 Q. When you say that it ``may be a  
19 portion,`` what did you mean?

20 A. It may be possible, I may have a  
21 record or I may not have a record. That's  
22 what I'm saying exactly.

23 Q. Does Hillside Auto Outlet have  
24 an obligation to keep all of the sales  
25 records for a period of time pertaining to



1 Ishaque Thanwalla

2 the Government regulations as to each car  
3 sold?

4 MR. KATAEV: Objection.

5 It calls for a legal  
6 conclusion, but you can  
7 answer.

8 MS. TROY: Answer as to  
9 the facts.

10 A. As long as they paid minimum  
11 wage, yes.

12 MR. KATAEV: Objection to  
13 the form of that last  
14 question.

15 Q. Were there records kept for each  
16 car sold in terms of the prior that was  
17 sold, the commission for each car?

18 MR. KATAEV: Objection.  
19 Asked and answered, but you  
20 can answer it again.

21 MS. TROY: He did not  
22 answer the question, and  
23 that's why I had to ask it  
24 again.

25 A. I can answer the question, yes.

1 Ishaque Thanwalla

2 There is probably a way to look at it.

3 Q. In other words there is a way to  
4 assert the answer to the commission and the  
5 wages that were given to car salespeople,  
6 including Leticia Stidhum that would be more  
7 precise than what we see on the pay stub  
8 component, is that correct?

9 A. Yes. We have to calculate it to  
10 make sure that at the end of the month to  
11 finish the month, they paid more than the  
12 minimum wage, we would have to be in  
13 compliance.

14 Q. Where are those records now?

15 A. Probably at the dealership,  
16 probably missing but I can't answer that due  
17 to the robbery.

18 Q. Those records that we we're  
19 talking about in terms of the commissions,  
20 the bonuses and the flat rate, is that kept  
21 on paper or on the computer?

22 A. It was kept on the paper.

23 Q. Was it ever scanned onto the  
24 computer?

25 A. Not to my knowledge.

1 Ishaque Thanwalla

2 Q. Was it kept on the paper from  
3 2018 to the present day; in other words, was  
4 there ever a change to the electronic  
5 system?

6 A. No, we have not changed, we have  
7 not updated to the electronic system.

8 Q. Can you describe for me what  
9 those records look like on the paper; what  
10 type of information is contained therein?

11 A. It would be a salesperson would  
12 fill out the amounts of the cars that they  
13 sold, the first name and last name of the  
14 customer, as well as they would write down  
15 how much bonus they have achieved, and they  
16 kept a copy. And we have a copy. That copy  
17 that would be made, so we verify, we make  
18 sure that the bonuses were correct, make  
19 sure that the deals were funded and we make  
20 sure that everything was to the open ``T`` the  
21 right way so that we can take care of the  
22 employees that we have by looking at the pay  
23 stubs.

24 Q. Was that the same or different  
25 from the triplicate copy that you were

1 Ishaque Thanwalla

2 talking about?

3 A. I don't understand the question,  
4 please.

5 Q. You mentioned that the paper  
6 that you described with the salesperson  
7 would fill out, the number of cars, the  
8 customer information and the bonuses  
9 achieved, et cetera, is that the same or  
10 different than the documents that were in  
11 triplicate that you mentioned before?

12 MR. KATAEV: I am  
13 confused. Triplicate? What  
14 does that mean?

15 MS. TROY: Three copies.

16 A. You're talking about 1 copy, 2  
17 copies, one is for them and one was for us.

18 Q. Is that filled out on a weekly  
19 basis or per-car sold?

20 A. Weekly basis by the salesperson.

21 Q. Who would verify if the  
22 information is correct?

23 A. The office manager.

24 Q. Who was the office manager at  
25 the time?

1 Ishaque Thanwalla

2 A. Deana was the controller and we  
3 called the office manager or maybe Asha. A-  
4 S-H-A.

5 Q. Who is Asha?

6 A. Asha is the assistant to Deana.

7 Q. Back for a second to the  
8 controller, the office manager, is that the  
9 same title?

10 A. Correct, basically.

11 Q. What was Asha's title?

12 A. Asha would give paperwork when  
13 it was done, give it to Deana so that Deana  
14 could process it and she verified and Deana  
15 verified it.

16 Q. Is she the assistant office  
17 manager, was she?

18 A. Yes, you could call her  
19 assistant office manager.

20 Q. When you said that the documents  
21 would be processed, what information would  
22 be coded in from the paperwork?

23 A. What do you mean by ``coded in''?

24 Q. You said that the documents  
25 would be processed, what did you mean?

1 Ishaque Thanwalla

2 A. Meaning when she goes through to  
3 make sure, to verify that the commission is  
4 the same, that is the process. The  
5 commission is not coded in. I said if you  
6 write down the name and 150 flat, and then  
7 there was any bonus on this, the customer on  
8 this car, you write down the bonus and then  
9 she verifies it and she processed it.

10 Q. When she processed it in order  
11 for the amount to become an ATM check  
12 amount, did she key in anything on the  
13 computer?

14 A. I don't know that. I can't  
15 answer that question.

16 MS. TROY: The next demand  
17 is going to be demand number  
18 7.

19 Before I get to that  
20 actually, hold on. Mr.  
21 Thanwall.

22 Q. Besides what you just  
23 described to me, were there any other  
24 documents kept as to the number of cars  
25 sold, what the commission is, what

1 Ishaque Thanwalla

2 the bonus is, et cetera for the car  
3 salespeople at Hillside Auto Outlet?

4 A. Let me understand this question  
5 correctly. You are saying did we have any  
6 bonus structure?

7 Q. No.

8 A. What is the question? I'm  
9 confused by your question.

10 Q. You mentioned that there was a  
11 paper that Deana would process. Besides  
12 that paper that Deana would process, were  
13 there any other written records of the  
14 number of cars sold and the bonus or  
15 commissions earned by the car salespeople at  
16 Hillside Auto Outlet?

17 A. I don't think so.

18 MS. TROY: Demand number 7  
19 is for the written documents  
20 containing the cars sold, the  
21 name of the customer, the  
22 bonus and commissions  
23 received. It is for the car  
24 salespeople at Hillside Auto  
25 Outlet, and the timeframe is

1 Ishaque Thanwalla

2 going to be from October of  
3 2018 through February of  
4 2019, and that includes,  
5 obviously, the plaintiff as  
6 well.

7 MR. KATAEV: Please  
8 follow-up in writing.

9 MS. TROY: Just to be  
10 clear, I believe these  
11 documents were asked for and  
12 directed to be produced by  
13 the Court. To the extent  
14 that the defendants state  
15 that they don't have the  
16 documents or that they are  
17 looking for them, it's not  
18 really so, just so that we  
19 are clear.

20 Demand number 8 will be  
21 for any electronic files or  
22 inputs by the office manager  
23 or her assistant regarding  
24 the same.

25 MR. KATAEV: Please



1 Ishaque Thanwalla

2 follow-up in writing.

3 Currently note whether it has  
4 been previously required to  
5 produce.

6 MS. TROY: We can now take  
7 that lunch break. Is 30  
8 minutes good for everyone?

9 MR. KATAEV: 45 minutes  
10 would be fine.

11 MS. TROY: Fine, let's  
12 come back at 1:25.

13 (A recess was taken from  
14 12:50 p.m. until 1:33 p.m.)

15 Q. Mr. Thanwalla, do you have your  
16 phone with you?

17 A. Yes.

18 Q. Could you go to your text  
19 messages that you had with Miss Stidhum?

20 A. Can I go to those text messages?  
21 It's in another office, a different office.

22 MR. KATAEV: I will get  
23 it.

24 (Mr. Manuel Kataev left the  
25 room and handed documents to

1 Ishaque Thanwalla

2 the witness)

3 MS. TROY: Just pull up  
4 the text messages that you  
5 have with Leticia Stidhum.

6 (The plaintiff Leticia  
7 Stidhum stated on the record  
8 that she is back on the  
9 record)

10 MS. TROY: Please mark  
11 this as Plaintiff's Exhibit  
12 3.

13 (Plaintiff's Exhibit 3 marked  
14 for identification.)

15 Q. Mr. Thanwalla, please read the  
16 timestamp on the message.

17 A. The message, it is October 9th,  
18 of 2018 and it is 11:03 a.m. It says ``Q40  
19 customer is coming with a check and his  
20 insurance.``

21 Q. Was that from Leticia to you?

22 A. Yes.

23 Q. What comes after that?

24 A. I said ``okay.``

25 Q. Then, what happened after that?

1 Ishaque Thanwalla

2 A. I am not a good reader.

3 MS. TROY: Mr. Kataev do  
4 you want to read?

5 MR. KATAEV: We are in the  
6 process of producing the text  
7 messages to you. We may not  
8 be able to produce them  
9 during the deposition. If  
10 you want to take a break, I  
11 will be able to produce it to  
12 you so that it is easiest for  
13 everyone.

14 MS. TROY: That sounds  
15 good to me. How much time do  
16 you need?

17 MR. KATAEV: 10 or 15  
18 minutes, and we will work as  
19 quickly as possible.

20 MS. TROY: Okay, that  
21 sounds good. That way we  
22 don't have to read it into  
23 the record. I agree.

24 It is 1:50, when do you want  
25 to come back?

1 Ishaque Thanwalla

2 MR. KATAEV: Let's come  
3 back at 1:45.

4 (A discussion held off the  
5 record)

6 MS. TROY: The time is now  
7 2:00 p.m. and we are back on  
8 the record. Actually, it is  
9 2:07.

10 Q. The text message that was just  
11 sent to me by Emanuel Kataev is a document  
12 that I'm going to mark as a PDF file and I'm  
13 going to mark that as Plaintiffs 4.

14 MS. TROY: Please mark  
15 that as Plaintiffs 4.  
16 (Plaintiffs Exhibit 4 marked  
17 for identification)

18 Plaintiffs 3 is going to  
19 be text messages, plaintiffs  
20 3 and then the PDFs that's  
21 the WhatsApp, which we marked  
22 as Plaintiff's Exhibit 4.

23 Q. We were talking about the text  
24 message before our break. It's probably  
25 going to be easier if we go in that order.

1 Ishaque Thanwalla

2 Q. I'm going to show you  
3 Plaintiff's Exhibit 3 first, which is what  
4 counsel just sent to me. Can you describe  
5 how you obtained this photograph; did you  
6 just use another phone and take a picture of  
7 your phone?

8 A. Correct.

9 Q. How about the second page which  
10 does not appear to be a text message, what  
11 is that?

12 A. This is a text message. If it's  
13 WhatsApp, I have no idea. You have two  
14 separate files, one is WhatsApp and one is  
15 text messages.

16 Q. Looking and drawing your  
17 attention to page 2 of the text message  
18 file, this --

19 A. Looking at the text message  
20 file, this is all from a single person, this  
21 is from Leticia.

22 Q. When you say ``Q40 customer is  
23 coming with a check and his insurance,`` were  
24 you the one who said ``okay?``

25 A. Correct.

1 Ishaque Thanwalla

2 Q. Do you know where on your phone  
3 it itemizes who is speaking when there is a  
4 blue bubble versus the white bubble, what  
5 that means?

6 A. I have no idea.

7 Q. The next line says ``Kaswayne K-  
8 A-S-W-A-Y-N-E Bailey is the name,'' is that  
9 correct?

10 A. Correct.

11 Q. Who is that from?

12 A. That is from her.

13 Q. Then, the next line says ``your  
14 friend is nice.'' Is that from you?

15 A. Yes.

16 Q. Then it says ``yeah, yeah,  
17 everyone is nice when they want a job lol.''   
18 Who is Leticia referring to?

19 A. I have no idea.

20 Q. When do you speak next on this  
21 text message?

22 A. I would have to have my phone to  
23 give that answer to that question.

24 MR. KATAEV: We can't do  
25 that because we are using

1 Ishaque Thanwalla

2 this export.

3 MS. TROY: It does not  
4 appear that page 23, 2  
5 through 23, it does not  
6 appear to me to be  
7 screenshots of the iPhone  
8 text messages. It looks like  
9 something else, but I'm not  
10 sure.

11 THE WITNESS: If it's a  
12 screenshot, when you push on  
13 the side, this goes into a  
14 PDF.

15 Q. I believe it just doesn't have  
16 who is speaking.

17 A. I spoke very little, mostly  
18 communications are by her and I answered  
19 very little.

20 Q. Then, what your attorney is  
21 talking about, it doesn't have the date or  
22 the time, correct?

23 A. Right.

24 MS. TROY: Emanuel, are  
25 you working on the text

1 Ishaque Thanwalla

2 messages to get the dates?

3 MR. KATAEV: That is  
4 correct.

5 MS. TROY: You are also  
6 working on the WhatsApp too?

7 MR. KATAEV: Right now we  
8 are focusing on WhatsApp.

9 MS. TROY: Fine, how about  
10 we come back to this in a  
11 little bit. I'm going to ask  
12 you a couple of questions  
13 that do not require the text  
14 messages. When your  
15 attorney's office is finished  
16 processing the messages with  
17 the date stamp and time, we  
18 will come back to it.

19 MR. KATAEV: That is fine.

20 Q. Mr. Thanwalla, did you at any  
21 point in time find out that Ms. Stidhum was  
22 pregnant?

23 A. No.

24 Q. Were you aware that she  
25 announced her pregnancy at Hillside Auto



1 Ishaque Thanwalla

2 Outlet?

3 A. To my knowledge, she never  
4 announced it.

5 Q. Did she at any time tell you  
6 personally about her pregnancy?

7 A. No.

8 Q. Did she bring a sonogram to  
9 Hillside Auto Outlet?

10 A. No.

11 Q. Do you recall which day she  
12 brought the sonogram to Hillside Auto  
13 Outlet?

14 A. I answered my question  
15 previously, no. She did not bring it, not to  
16 my knowledge, '' ever in front of me.

17 Q. Were other Hillside Auto Outlet  
18 employees aware that Ms. Stidhum was  
19 pregnant, to your knowledge?

20 A. To the best of my knowledge,  
21 when I learned when I was in Pakistan. Mr.  
22 Ali on WhatsApp said ``your daughter is  
23 pregnant, '' which is on the WhatsApp app.  
24 That was December 27th, if I recall, because  
25 I just went there and why I recognized that

Ishaque Thanwalla

date, I said ``which one?`` Because I call every one of them my ``daughter.`` I treated them like one.

My answer to you was I was the last person to know, and that was my answer.

That was December 27th, according to my knowledge, and she never announced it.

Never brought anything to the dealership. I don't think anyone was aware, maybe she got close to Ali, so she may have told him. She may have told him about the pregnancy.

Q. At that time was Ali at Hillside Auto Outlet?

A. I don't understand your question.

Q. At the time was Ali at Hillside Auto Outlet?

A. ``At the time?`` What do you mean by ``at the time``?

Q. At the time, during December, December 27th of 2018, when you supposedly received the text messages, on WhatsApp, was he --

A. Yes, he was working as my

1 Ishaque Thanwalla  
2 assistant.

3 MR. KATAEV: Objection to  
4 the form of that question.

5 Q. Due to the fact that you have  
6 multiple assistants, can you clarify whether  
7 it was the sales manager, the office manager  
8 or the finance manager; what is it?

9 A. He was a sales manager and  
10 Guzman as well as Guzman, because I always  
11 needed two people to cover the hours.

12 Q. When was Ali hired as your sales  
13 manager?

14 A. To the best of my knowledge, I  
15 can recall that it was in December.

16 Q. Was he hired in preparation for  
17 your departure to Pakistan?

18 A. No. He was hired because I  
19 needed help.

20 Q. Besides Ali, did anyone else  
21 communicate whether by text, verbal  
22 communication or personal telephone to you  
23 about Leticia's pregnancy?

24 A. No.

25 Q. To your knowledge, did Leticia

1 Ishaque Thanwalla

2 get along well with the other Hillside Auto  
3 Outlets?

4 A. To the best of my ability, yes.

5 Q. How about with yourself?

6 A. Well, she did very well, yes. I  
7 treated her like my family.

8 Q. In or around the month of  
9 November of 2018, did you congratulate her  
10 for selling many cars for the Hillside Auto  
11 Outlet?

12 A. I probably did, because she  
13 probably did a good job.

14 Q. At that time, did you discuss  
15 potentially promoting her to the sales  
16 manager position?

17 A. Like I answered previously, no.  
18 And, my answer is still no, and it still  
19 remains no.

20 Q. What was your reaction when you  
21 found out that Leticia was pregnant?

22 A. My reaction was the way that I  
23 found out, I was in Pakistan when Ali texted  
24 me -- not texting me, the WhatsApp,  
25 WhatsApped me. This was the only time I got

1 Ishaque Thanwalla

2 that news.

3 Q. Do you recall what your response  
4 to Ali was?

5 A. I mentioned my response to you,  
6 ``I was the last one to know.``

7 MS. TROY: Can we have  
8 your office please provide  
9 the WhatsApp between Ali and  
10 Ishaque Thanwalla?

11 MR. KATAEV: No problem.

12 MS. TROY: So we don't  
13 need him to read it into the  
14 record.

15 Q. To be clear Mr. Thanwalla, did  
16 you communicate with Ali about Leticia on  
17 What'sApp or also on text message?

18 A. I know I never talked to him on  
19 text message, only on WhatsApp. I wasn't in  
20 the country, and that's the only way you can  
21 communicate over the WhatsApp. It's an  
22 international channel.

23 Q. Let's go back for a second to  
24 Plaintiff's Exhibit 2 that I am sharing on  
25 the screen with you. Please bear with me

1 Ishaque Thanwalla  
2 for one moment.

3 MS TROY: For the record,  
4 Plaintiff's Exhibit 2, pages  
5 75 to 1179 are customer  
6 dashboard logs that were  
7 provided to us on the part of  
8 the defendant's document  
9 production. We are now on  
10 page 812 which corresponds to  
11 defendant's document  
12 production number 812.

13 Q. My question for you, is as  
14 follows: once you reviewed the document,  
15 please tell me to slow down if necessary and  
16 I will scroll through it.

17 (Ms. Troy is scrolling down)

18 Can you explain to me why this was  
19 marked as "lost?"

20 A. Jacquelyn Cleary was the first  
21 BD agent, the second rep was Mikiael M-I-K-  
22 I-A-E-L- and Andris Guzman. If it was  
23 Capital One source of the lead, when we do a  
24 Capital One, mailer, it came in, and we  
25 created, it just came in on 12/29 2018 at

1 Ishaque Thanwalla

2 11:28 a.m. There is also a serial number.

3 Please scroll down.

4 (Ms. Troy complies.)

5 A. (Continuing) It says the  
6 customer name, Ofelia O-F-E-L-I-A Fuentes F-  
7 U-E-N-T-E-S. Then, the second person took  
8 on over, another BD agent ``changed from  
9 Heewattie Prashad to Mikiael.

10 It always gives you all the information,  
11 what day the lead came in. Can you scroll  
12 back up to 1229?

13 (Ms. Troy complies)

14 A. (Continuing) So, when you see  
15 the dates, and please scroll back down to  
16 520 of 2019, there was -- the deal was  
17 closed because we couldn't get hold of the  
18 customer. It comes out of the system, and  
19 after 90 days, that is when it comes out of  
20 the system.

21 Q. Is that the track system?

22 A. That is what it says here, I  
23 think we are both saying the same thing.  
24 (The reporter speaks to Ms. Troy on the  
25 record)

1 Ishaque Thanwalla

2 MS. TROY: Ms. Luckman has  
3 a great point which is in  
4 order for us to have a clear  
5 record, please just wait  
6 until I finish asking you the  
7 question. Then, you can jump  
8 right in.

9 THE WITNESS: I apologize  
10 if I jumped in.

11 MS. TROY: That is  
12 perfectly fine.

13 Q. My question for you is, because  
14 the lead is marked as ``lost,`` is it possible  
15 that for instance that this deal in fact  
16 went through?

17 A. I don't understand your  
18 question.

19 Q. Because this lead is  
20 ``automatically marked as lost,`` after 90  
21 days, is it possible that this lead went  
22 through, meaning there was a sale on the  
23 vehicle?

24 A. When I can answer that question,  
25 is maybe possible because the car was sold,



1 Ishaque Thanwalla

2 and Leticia or Mikiael or anybody did not  
3 manually put ``sold.'' There's a possible  
4 chance yes, that that can happen.

5 Q. Could it possibly be true that  
6 sometimes lead was lost, but was not entered  
7 into the system properly?

8 A. Yes, it can be possible.

9 Q. Is it generally the case that  
10 customers who did not come through the BDC  
11 with the amount, that those log-in customers  
12 are generally speaking, not logged into the  
13 system?

14 A. They were logged into the system  
15 by the salesperson as well as one of the  
16 assistant managers.

17 Q. Were there cases where they were  
18 not logged in?

19 A. It happens, it's like -- you get  
20 a salesperson who is not doing his or her  
21 job. The manager is not doing their job,  
22 and I can't keep up with everything.

23 Q. You mentioned that there was a  
24 system, what system was it?

25 A. Vin V-I-N Solutions.

1 Ishaque Thanwalla

2 Q. When you talked about Vin  
3 Solutions, was the salesperson paid the  
4 effective amount of bonuses? In other  
5 words, if the car was not logged into the  
6 system, would they still get the bonus or  
7 the commission, I'm sorry, on the car sold?

8 A. Let me understand your question  
9 correctly. If the Vin Solutions does not  
10 have any effect on their bonus over there,  
11 that answer is no bonus, they got paid on  
12 what they sold. We have a complete file of  
13 the customer and the salesperson provides a  
14 commission sheet, like I mentioned in my  
15 previous question that you asked me. They  
16 would write down the name of the customer,  
17 and if the car had any bonus to it. If it  
18 could be a bonus of 25, \$50 or 5 percent,  
19 any kind of bonus. They would write it down  
20 because I have a different kind of bonus  
21 structure, every -- it's different, every  
22 time, it's is different every day. So, no  
23 salesperson would ever not get paid on a  
24 deal that they delivered a car.

25 Q. Now we are looking at

1 Ishaque Thanwalla

2 defendant's document production 249 and we  
3 are still on that same set of documents,  
4 with the customer dashboard log. Page 249  
5 of Plaintiff's Exhibit 2 corresponds to  
6 defendant's document production 249.

7 I'm going to turn your attention to a  
8 specific section on this particular log  
9 pertaining to an individual Franklin Yanes  
10 Y-A-N-E-S.

11 Specifically I'm going to turn your  
12 intention to defendant's production 252 that  
13 corresponds to page 252 of Plaintiff's  
14 Exhibit 2.

15 Please turn your attention to the amount  
16 of time that the showroom visit lasted. Can  
17 you explain that to me and can you tell me  
18 what that shows?

19 MR. KATAEV: Objection to  
20 the form. You can answer.

21 A. It's a very simple answer.  
22 Leticia herself gave the answer for this  
23 particular line at the last time at the  
24 deposition. You can look into it on her  
25 deposition. It was marked as an ``visit,``

1 Ishaque Thanwalla

2 but nobody marked it until it was the second  
3 day. The customer was not sitting there for  
4 22 hours, it is impossible, we are not even  
5 open 22 hours straight.

6 Q. Is it accurate to say that in  
7 fact the amount of time is the amount of  
8 time it takes the BDC employee to log, for  
9 instance the showroom visit as opposed to an  
10 actual waiting time?

11 A. Mostly it is done by the  
12 salesperson person. What happens when the  
13 salesperson does not do it, what happens is  
14 that BDC person finds out, and they put the  
15 visit in. Like I said, that is controlled  
16 by everybody, so they can do either a visit,  
17 they can put it next to the sold, it's not  
18 the final record for the sale or for the  
19 visit.

20 MS. TROY: Let's go off  
21 the record.

22 (A discussion was held off  
23 the record)

24 Q. In terms of the wait time, can  
25 you describe to me once the customer comes

1 Ishaque Thanwalla

2 in, what do they need to wait for, what are  
3 the different things that they need to wait  
4 for in order to walk out with the car or  
5 walk out without the car, for instance?

6 A. So, your question is how long it  
7 takes to sell a car, is that what your  
8 question is?

9 Q. Yes, with different components  
10 broken down.

11 A. Different components broken  
12 down, every situation is a different  
13 situation. Meaning when I say ``situation,``  
14 that means I have customers and every deal  
15 is different one next to the other.

16 Q. I'm going to follow-up for a  
17 second. If the customer does not require  
18 any mortgage, what would the situation be?

19 MR. KATAEV: Objection to  
20 the form.

21 A. If it's a cash deal, it still  
22 takes time, I still have to go through the  
23 process of printing the paper, it's still a  
24 process, for the DMV. Sometimes in our  
25 locations, our internet is not the greatest,

1 Ishaque Thanwalla

2 and it can take a while. Maybe the printer  
3 is not working, maybe the DMV printer which  
4 is a Dealer Track Management printer, you  
5 have to look up for security purposes, it  
6 sometimes does not go on. Maybe the  
7 customer has to wait 45 minutes for us to  
8 print it because of the internet issues,  
9 even in a cash deal, it can take time based  
10 on that. Then, once the process is  
11 finished, if they can process it with the  
12 Department of Motor Vehicles, we do all the  
13 DMV in-house.

14 At that time, we are required to make  
15 sure that our customer, the consumers have  
16 the insurance and have a scanned copy, that  
17 way we can scan it into the Department of  
18 Motor Vehicles.

19 Everything is time consuming because it  
20 is not a washing machine, where you just pay  
21 a quarter and you put the washing machine  
22 on. You don't just walk out the door This  
23 is an automobile, there are legalities which  
24 have a lot of crossing your ``T's`` and  
25 dotting your ``I's`` because the Department

1 Ishaque Thanwalla  
2 of Motor Vehicle, it's a Government  
3 department. It takes time and we want to do  
4 it the right way, not the wrong way, so we  
5 have problems.

6 Q. You mentioned doing it the  
7 ``right way`` with the DMV, how long does it  
8 take, roughly?

9 A. Let me just say, when you say  
10 ``the right way,`` we try our best to do the  
11 right way. I'm not sure if you get my  
12 answer, we try our best.

13 Q. My question is: how long does it  
14 take?

15 A. It can take between 30 minutes  
16 to 2 hours or 3 hours. I can't answer that  
17 question 100 percent.

18 Q. Let's talk about the different  
19 types of customers, one that is essentially  
20 the cash deal, the one you have to run the  
21 credit score, how much additional time with  
22 that additional factor that you just  
23 described for me?

24 A. It is different, it could be  
25 between 1 hour to another 2 hours or 3hours.

1 Ishaque Thanwalla

2 Q. That 1 to 2 hours, is that all  
3 for the customers so that he gets to walk  
4 away with the car or --

5 A. It could be, but it could not  
6 be, because we are still waiting for the  
7 bank to answer, for that answer. Then, we  
8 have to get the insurance and sometimes they  
9 have no insurance, you have to have multiple  
10 processes in the auto industry. To give you  
11 an example, there are some online seminars  
12 from the FTC, the Federal Trade Commission,  
13 and they are saying that if it requires that  
14 long to sell a car, they even recognized it  
15 because so many processes are involved. It  
16 can take between 2 hours to 6 hours and I  
17 can't tell you how often.

18 Q. On-average, how much time does  
19 it take for customers to walk out with the  
20 car; let's start with customers that are  
21 doing a cash deal?

22 MR. KATAEV: Objection.

23 Asked and answered but you  
24 can answer again.

25 Q. Between 2 and 4 hours.



1 Ishaque Thanwalla

2 Q. How about the customer that  
3 requires some form of credit.

4 A. Like I said, 2 to 4 hours, 6  
5 hours maybe.

6 Q. Can you describe how the  
7 DealerTrak system works?

8 A. The DealerTrak system, we put  
9 the consumer's information, and that is what  
10 we don't give a login and a password.  
11 Everyone and anyone, we don't give it to  
12 them, it's only the service people have it,  
13 certain people.

14 You can put in consumer information in  
15 there, then you send it to the bank.  
16 Because we are a -- because we have a bank  
17 hookup directly to the Dealertrak it goes to  
18 the banker and notwithstanding, the analysts  
19 will look at it, at the application. It  
20 depends on the bank how busy they are and  
21 what kind of credit structure that is. And,  
22 if they have to calculate the LTD, which is  
23 the loan to debt.

24 Have to make sure that they verify the  
25 employment of whatever the requirement on

1 Ishaque Thanwalla

2 the analyst's side is sometimes they give  
3 the answer in half an hour and sometimes it  
4 can take three hours. Sometimes it comes  
5 back and asks for more paperwork.

6 They ask to come back maybe in half an  
7 hour and we say ``okay.'' It may require on  
8 this guy, maybe once you give the pay stub,  
9 they provide me with the truth, with the  
10 proof of the address, we are going to go  
11 back to the consumer, and scan it. It's a  
12 different case, different thing. Every time  
13 is different, no 2 cases in your business  
14 are the same. That's the same thing with  
15 us, there are no 2 customers that are the  
16 same, everyone is different.

17 One takes 3 years to close the case and  
18 one takes 3 months to close the case. It's  
19 like in your business.

20 Q. Let's backtrack for a moment, in  
21 November of 2018 who was running the dealer  
22 log, who was running that?

23 MR. KATAEV: Objection to  
24 the form. You can answer.

25 A. I myself, and whoever was my

1 Ishaque Thanwalla  
2 assistant.

3 Q. Who would that be?

4 A. I don't know who it may be, it  
5 may be Guzman, it may be Jeanique. I don't  
6 know who was there, I can't recall who was  
7 there at the time.

8 Q. How about right before you left  
9 for Pakistan, who was running the DealerTrak  
10 system?

11 A. Ali.

12 Q. Besides Ali, anyone else?

13 A. Yes, Guzman.

14 Q. Anyone else?

15 A. Serge has the power, he is the  
16 finance manager and Louis had the power, he  
17 is a finance manager. That's about it,  
18 that's what I can recall. Maybe somebody  
19 else, but I don't know. I can't recall.

20 Q. Is it accurate to say that Serge  
21 and Louis were typically running the  
22 DealerTrak for the customers just usually,  
23 and would it be the sales manager who did it  
24 as well?

25 A. It's not typical. It's not

1 Ishaque Thanwalla

2 typically. I can't 100 percent answer that  
3 to give you an example, let's just say it  
4 was one day and Guzman is off and Ali is on  
5 the shift, correct? So what happens is Ali  
6 has one file and the other salesman has  
7 another customer. Ali would say ``take this  
8 to service to run the credit,'' or take it to  
9 Louis to run the credit. That typically  
10 happens.

11 Q. When you were out in Pakistan,  
12 you usually did not run the DealerTrak  
13 system, correct?

14 A. Correct. But, I have it on the  
15 DealerTrack from back home. I can look up,  
16 I can look it up because I look at my  
17 reports and I look at my things almost every  
18 day.

19 I am hands-on, either when I was in the  
20 country or either if I am out of the  
21 country, either if on I'm vacation, even if  
22 I'm not on vacation. I am very hands on.  
23 That's the only thing I have to say, this is  
24 my baby and I work very hard all my life to  
25 have something.

1 Ishaque Thanwalla

2 Q. Understood. The DealerTrak,  
3 does it log out when the user logs in, as  
4 well as the ICU location?

5 A. It tracks the ICU location,  
6 correct, as well as what not to allow if  
7 they look at the credit, but I can run the  
8 credit.

9 Q. In other words you can tell who  
10 was logging in where at what time using your  
11 account and password?

12 A. Yes. Nobody else should get on  
13 my log on password, nobody has it unless  
14 somebody stole it.

15 Q. We're going to go now back to  
16 Plaintiff's Exhibit 2 for identification and  
17 specifically, I'm going to have you take a  
18 look at page 1281, which again corresponds  
19 to defendant's documents production 1281 for  
20 an individual that was identified as ``2.``

21 Mr. Thanwalla, you don't know the  
22 individual, is it fair to say that each of  
23 the pay stubs that were demarcated with an  
24 ``2`` pertaining to an individual, the same  
25 individual was marked as 2?

1 Ishaque Thanwalla

2 MR. KATAEV: Objection to  
3 the form. You may answer.

4 A. I don't know. I can't answer  
5 that question because I don't know what 2  
6 is.

7 MR. KATAEV: I'm making  
8 the representation to counsel  
9 that I made an identification  
10 marker on there, wherever 2  
11 is listed by the ID number,  
12 it's the same person.

13 Q. Okay. My follow-up question to  
14 that is, for each of the different numbers  
15 that were placed on the earnings statement,  
16 those numbers for instance that say ``35,``  
17 would they pertain to the individual 35?

18 MR. KATAEV: If the  
19 question is for the documents  
20 labeled 35, it refers to the  
21 same person and the answer is  
22 yes. I'll make the  
23 representation that I made  
24 the markers on this.

25 THE WITNESS: I was aware

1 Ishaque Thanwalla

2 of it.

3 MS. TROY: That you were  
4 aware?

5 THE WITNESS: I was.

6 MS. TROY: Can you  
7 possibly move the speaker  
8 closer to you?

9 (The witness complies)

10 MS. TROY: So that it is  
11 clear. Emanuel, please do  
12 that.

13 (A discussion was held off  
14 the record)

15 MS. TROY: We are back on  
16 the record at 2:46.

17 Q. Are you alleging now that  
18 someone that had unauthorized access to  
19 DealerTrak?

20 A. I never alleged that, I never  
21 said that.

22 Q. Did you --

23 THE WITNESS: I am not  
24 done with my answer.

25 MS. TROY: I'm sorry. Go

1 Ishaque Thanwalla

2 ahead.

3 A. I said ``maybe somebody stole my  
4 DealerTrak ID and password.'' I'm not aware  
5 of that, just letting you know, just telling  
6 you that I never alleged anybody having it,  
7 no. I wasn't giving it out, It's too much  
8 of a privacy issue.

9 Q. Let's backtrack for a moment to  
10 the robbery, who was the robber?

11 A. It was an employee we hired and  
12 that was him. I don't know. He got caught  
13 and he got punished for it.

14 Q. Was that employee's name  
15 Anthony?

16 A. I think so, not 100 percent  
17 recalling everything.

18 Q. Did Andris Guzman have any  
19 authority to discipline employees?

20 A. Andris Guzman only takes orders  
21 from me when I ask him to do.

22 Q. So, please answer my question;  
23 it's a yes or no question, did he have the  
24 authority to discipline employees?

25 A. Did he have any authority to



1 Ishaque Thanwalla  
2 discipline employees? His job was to run  
3 credit and make sure everything was  
4 organized, not to my knowledge, he had  
5 authority to discipline, no. To my  
6 knowledge, he had no authority to discipline  
7 unless he came to me and I disciplined.

8 Q. Has he ever come to you for you  
9 to discipline an employee?

10 A. Not really. I never had issues  
11 at my dealership, we run a good and happy  
12 family, that's the way we work, that is the  
13 way that I still work. You can see by my  
14 persona that's the way that I am, I'm very  
15 happy and very loving and very caring. I  
16 will give the shirt off my back to my  
17 people.

18 Q. Did Andris Guzman have the  
19 authority to hire employees?

20 A. No.

21 Q. How about firing employees?

22 A. No.

23 Q. How about to set schedules?

24 A. Set the schedule? Yes.

25 Q. Did Ali generally --

1 Ishaque Thanwalla

2 A. Ali, did all of that, the people  
3 to get you the right answer, complete  
4 answer. All of the people, do you mean all  
5 the sales managers?

6 Q. The sales managers.

7 A. Sales managers yes, not my  
8 finance manager.

9 Q. Did he set the schedule for the  
10 salespeople only or for everyone?

11 A. When you say open ``salespeople  
12 only,'' and everyone, when you say  
13 ``everyone,'' I wouldn't say everyone because  
14 he ran his -- his title was sales manager  
15 and his department was sales. So, he only  
16 managed the salespeople.

17 Q. Who decided which salesperson  
18 should go to whom to run the credit through  
19 the DealerTrak system?

20 A. Can you repeat your question?

21 Q. I --

22 A. Can you ask your question in a  
23 different form, maybe where I can completely  
24 answer it and comprehend it?

25 MS TROY: I'm going to

1 Ishaque Thanwalla

2 have the court reporter read  
3 the question back. Let me  
4 know if you understand it, if  
5 not, I will rephrase it.

6 (The reporter reads back the  
7 last question)

8 A. Let me understand this question,  
9 which salesperson decided which salesperson  
10 can go to which manager, is that the  
11 question?

12 Q. To run the credit, yes.

13 A. It is based upon any salesperson  
14 can go to any manager who is available at  
15 the time. There is no preference, there is  
16 no term, anyone can walk up to any manager.

17 Q. During Leticia's employment with  
18 Hillside Auto Outlet, did she have you run  
19 the credit from time to time?

20 A. The answer to that question is  
21 yes, I ran credit, Guzman ran credit,  
22 Jeanique ran credit, Ali ran the credit, and  
23 sometimes we were all busy and she went to a  
24 finance manager and read the credit. Did  
25 that answer your question completely?

1 Ishaque Thanwalla

2 Q. Did there come a time when  
3 Andris Guzman was new and he was learning  
4 how to run the credit?

5 A. Guzman was my manager since a  
6 very long time.

7 Q. I understand. When did he start  
8 running the credit for Hillside Auto Outlet?

9 A. The day he started to work with  
10 me.

11 Q. To be clear, what was that date?

12 A. I can't recall. I don't know.  
13 I can't remember, but he knew it before he  
14 came to work for me because he worked with  
15 me at a previous location.

16 Q. Where was that previous  
17 location?

18 A. Is that relevant?

19 MR. KATAEV: You have to  
20 answer. Objection to  
21 relevance, but you have to  
22 answer.

23 A. Queens Auto Mall.

24 Q. You are saying that he ran the  
25 credit at Queens Auto Mall also?

1 Ishaque Thanwalla

2 A. He worked for me over there,  
3 yes, he did things for me, yes.

4 Q. The question specifically is:  
5 did he run the credit at Queens Auto Mall?

6 A. Yes.

7 Q. Again, just as a reminder, it's  
8 the same idea, nothing personal, please just  
9 wait until I finish asking the question  
10 before you jump in. That way we don't need  
11 you to repeat yourself, understood?

12 A. Yes, understood, perfect.

13 Q. During Leticia's employment with  
14 Hillside Auto Outlet, was she a dependable  
15 employee?

16 MR. KATAEV: Objection,  
17 but, you can answer.

18 A. When you say ``dependable  
19 employee,`` can you elaborate? Do you mean  
20 was she on time every day, is that what you  
21 are asking me?

22 Q. Let's start with that.

23 A. Yes. Sometimes she came late  
24 and sometimes on time, she was dependable.  
25 At times she went early, she left early.

1 Ishaque Thanwalla

2 That was when she wasn't feeling well or had  
3 something else to do based on her ability  
4 because she sold a lot of -- she spent a lot  
5 of time, and I gave her leeway that she  
6 needed.

7 Q. Would you say that she was an  
8 excellent employee?

9 A. She was an excellent  
10 salesperson.

11 Q. At any point during her  
12 employment, was she ever disciplined?

13 A. I think maybe once, but I can't  
14 recall what the reason was.

15 Q. I know you cannot recall the  
16 incident, do you recall maybe when that  
17 happened?

18 A. I cannot answer that, I really  
19 can't remember, honestly.

20 Q. At any point during her  
21 employment with Hillside Auto Outlet, was  
22 Leticia ever suspended?

23 A. From Hillside Auto Outlet?

24 Q. Correct.

25 A. I don't think so.

1 Ishaque Thanwalla

2 Q. Let's backtrack for a second,  
3 were any car salespeople ever given a  
4 written evaluation at any point between 2018  
5 and 2019?

6 A. They were given an evaluation  
7 every month based on her or his sales.

8 Q. That evaluation is the same or  
9 different from the amounts of money that  
10 they got?

11 A. The amounts of money correlates,  
12 the sales, equal amount of money.

13 The more sales that you make, you make a  
14 lot of money, if you don't make a lot of  
15 money -- if you don't make a lot of sales,  
16 you don't make a lot of money.

17 Q. I understand. I just want to  
18 know the written evaluation every month was  
19 based on his or her sales; what form is that  
20 report kept?

21 A. I answered your question. We  
22 did evaluations, but not in writing. I said  
23 we did evaluations based on the sales that  
24 they did, a good or great job. We sat down  
25 with them, ``good, now let's move on and do a

1 Ishaque Thanwalla

2 better job, you did a great job. Next time  
3 do a better job.'' We say ``are you going to  
4 make another 20 sales this month?'' We're  
5 going to do this extra so that we can make  
6 more deals so that you can make more money.  
7 We get more done for the bonuses, whatever  
8 the bonuses were.

9 Q. To be clear, was one of the ways  
10 in which the number of cars sold per  
11 salesperson tracked on a board with a name  
12 and a tally?

13 A. You got that right, yes. We  
14 used to have a board, but we don't any  
15 longer have the board.

16 Q. Is it accurate to say that when  
17 you left for Pakistan that Leticia was  
18 leading the board, meaning she was the top  
19 saleswoman based on the tally?

20 A. I can't answer that, I can't  
21 recall that in my memory.

22 She was always first or second or third  
23 in position. So, there were three top  
24 people at the time, one was Leticia, one was  
25 -- I have a person Sean, and he was always



Ishaque Thanwalla

on top. Or it was one was one month, one was the second month and one was the third month. She was always first or second or third on the position. So, there were three top people, one was Leticia, one was David Parsons and the other one was Shane. They were always on the top of each other, meaning one was one month, one the second month, and one the third month. They were always first, second and third position, usually.

Q. When you talked about Shane, what was Shane's last name?

A. I can't remember his name, it's an Arabic name and I can't pronounce it.

Q. Is it Shane or Sean?

A. Shane. When I called him ``Sean,`` he said ``don't call me Sean.`` He said it is ``Shane.``

Q. Do you recall Leticia being the first, second or third; do you recall if she was actually always the first before you left for Pakistan?

Q. Always the first one putting on

1 Ishaque Thanwalla

2 the board, I said it was between the first,  
3 second and third, all of them.

4 A. Do you recall how many cars were  
5 sold on-average by David Parsons?

6 They all averaged between 15 and 25 one  
7 month, one is 15 the other, the other is 20,  
8 22 or 25. One did the next month 25 and the  
9 other did 15. It always varied, it's a  
10 variable number in between those numbers.

11 Q. When did David start to work at  
12 Hillside Auto Outlets, do you remember the  
13 month?

14 A. I can't remember, but the year  
15 would be 2018. But, the month, I can't  
16 answer that.

17 Q. Do you recall what his base pay  
18 was?

19 A. I can't recall.

20 Q. How about Shane, when did he  
21 start working at Hillside Auto?

22 A. The same year, 2018. He is still  
23 there.

24 Q. When did David Parsons end  
25 working at Hillside Auto?

1 Ishaque Thanwalla

2 A. I can't recall.

3 Q. Was the Shane that we were  
4 talking about an African-American  
5 individual?

6 A. Shane is Arabic, Middle-Eastern,  
7 I would say.

8 Q. Was that the Middle Eastern  
9 individual that you were talking about  
10 working for Hillside Auto Outlet, was that  
11 at the same time that Leticia was working  
12 there?

13 A. The same time as Leticia was  
14 working there?

15 Q. Correct.

16 A. Yes. Supposedly. So, if that  
17 person was working there, he would appear on  
18 the earnings statement that were provided by  
19 you to your attorney; is that correct?

20 A. You have all of the documents.

21 MS. TROY: Cutting to the  
22 chase, if you could just  
23 provide the unredacted  
24 version of the documents,  
25 because there is clearly some

1 Ishaque Thanwalla

2 confusion as to who and what  
3 or even if Mr. Parsons  
4 actually was there.

5 MR. KATAEV: Follow-up in  
6 writing and we will respond  
7 accordingly.

8 Q. I'm going to turn your attention  
9 to Leticia's pay stub Mr. Thanwalla. We are  
10 on page 1187, which corresponds with  
11 defendant's document production 1187.

12 Mr. Thanwalla, does this comport with  
13 your understanding in terms of the regular  
14 wage rate that was provided to Ms. Stidhum  
15 while she was a commissioned salesperson,  
16 the regular \$300 salary plus the commission?

17 A. Yes. That is people on this pay  
18 stub, \$1,080, but I don't understand minimum  
19 wage.

20 Q. Going to the next page we are  
21 now on page 1188 which corresponds to  
22 defendant's document production 1188. Does  
23 the \$780 figure, the commission, meaning the  
24 flat commission \$150 per car sold plus a 5  
25 percent bonus?

1 Ishaque Thanwalla

2 A. It can represent numerous  
3 things. Like, you can have 5 cars plus a  
4 bonus car, or 5 cars plus maybe 1 car, 5  
5 percent, 5 cars plus the weekend bonus.  
6 There are a lot of -- there can be  
7 variations here, this is not an exact thing  
8 like I mentioned to you previously numerous  
9 times, that we have different bonus  
10 structures and that is why we cannot say  
11 flat.

12 Q. That bonus structure is sort of  
13 laid out in the weekly deposits that I  
14 demanded today, correct? That was filled out  
15 by each car salesperson on a weekly basis?

16 MR. KATAEV: Objection to  
17 the form. You can answer.

18 A. I guess, yes.

19 Q. Was that ever turned over by you  
20 to us?

21 MR. KATAEV: Objection to  
22 the form. You can answer.

23 A. I have no idea.

24 MR. KATAEV: If you want  
25 to take a look, we can try to

1 Ishaque Thanwalla

2 look and see if we can pull  
3 that text.

4 MS. TROY: That's fine.  
5 The time is now 3:06 p.m. and  
6 we will come back on the  
7 record at 3:20.

8 MR. KATAEV: Yes, 3:20.

9 MS. TROY: You need that  
10 much time?

11 MR. KATAEV: Yes, to get  
12 it printed and scanned.

13 MS. TROY: Fine. Let's  
14 take that break.

15 (A recess was taken from 3:06  
16 p.m. until 3:24 p.m.)

17 MR. KATAEV: I represent  
18 to you, Tiffany, that I have  
19 sent you the WhatsApp  
20 messages for the entire  
21 meeting of Leticia's exchange  
22 with the witness. But, the  
23 ones between Ali, that is  
24 only for the relevant period  
25 because the entirety of the

1 Ishaque Thanwalla

2 other messages have very  
3 sensitive financial  
4 information that we object to  
5 producing. So, if we need to  
6 deal with that objection, we  
7 will deal with it with the  
8 Court.

9 I'm just making a  
10 representation to counsel  
11 that nowhere else in the 18  
12 pages of messages is Leticia  
13 referenced or anything  
14 related to this case. It is  
15 mostly all financial  
16 information and information  
17 related to particular sales.

18 MS. TROY: Is the message  
19 pertaining to particular  
20 sales related to sales that  
21 Leticia may have done while  
22 she was working at Hillside  
23 Auto Outlet?

24 MR. KATAEV: There is no  
25 way to tell, I don't think

1 Ishaque Thanwalla

2 so. But, I don't know, the  
3 final thing I want to say is  
4 that you have the complete  
5 regular text messages  
6 exchanged between the witness  
7 and your client, the  
8 plaintiff. That is in the  
9 final email that I just sent.  
10 I believe it says ``Leticia's  
11 text messages.'' We will  
12 Bate's stamp that when it is  
13 time so that we don't have to  
14 waste time and you can  
15 proceed with the deposition.

16 MS. TROY: Let's go off  
17 the record.

18 (A discussion was held off  
19 the record)

20 MS. TROY: It is now 3:40  
21 p. m. and I will review the  
22 documents.

23 I'm going to mark the  
24 exhibit, the document that  
25 was sent again, text messages



1 Ishaque Thanwalla

2 I believe using a Decipher  
3 App, between Mr. Thanwalla  
4 and Leticia that we're going  
5 to mark now as Exhibit 5.

6 (Plaintiff's Exhibit 5 marked  
7 for identification).

8 Exhibit 6 is his decipher  
9 chat between Leticia and Mr.  
10 Thanwalla on the WhatsApp  
11 chat. Then, exhibit 7 is  
12 decipher chat conversations  
13 page 5 of 18 between Mr.  
14 Thanwalla and Ali.

15 (Plaintiff's Exhibit 6, and 7  
16 now marked for  
17 identification.)

18 Q. I'm going to show you various  
19 exhibits and ask you a couple of questions.  
20 We are now looking at exhibit 3 and my  
21 question for you is: when were these  
22 photographs taken?

23 A. I think yesterday or the day  
24 before yesterday.

25 Q. Why were these photographs

1 Ishaque Thanwalla

2 taken?

3 A. Because I was messaging and I  
4 wanted to put them into a file.

5 Q. You believe that you may have  
6 done it on Wednesday or Thursday, and you  
7 were just putting a photograph of the text  
8 message, correct?

9 A. That's the only way that I knew  
10 how to do it.

11 Q. You took it on your phone or  
12 some other person's phone?

13 A. It's my second phone.

14 Q. Did you text at all with Laticia  
15 on your second phone, meaning the phone that  
16 you used to take the pictures?

17 A. I never texted to her, this is a  
18 form, because too many customers were  
19 calling or texting in the middle of the  
20 night and I required a phone a few months  
21 back and that is the phone.

22 Q. Did you represent to me that  
23 these messages were between you and Leticia;  
24 if so, you are on the blue and Leticia on  
25 the white, actually, on the gray?

1 Ishaque Thanwalla

2 A. Yes.

3 Q. Is this an accurate  
4 representation of the text messages just  
5 that you sent and you received from Leticia?

6 A. It's on the phone, that's  
7 accurate on the phone that you are showing  
8 me, yes.

9 Q. Is that the same for the  
10 entirety of the text messages, meaning all  
11 23 pages that I am showing you on the screen  
12 right now, is that accurate as far as you  
13 can tell?

14 A. Yes.

15 Q. Next we're going to turn our  
16 attention to exhibit 4, same question for  
17 which is: when was the photograph of the  
18 phone taken?

19 A. Either yesterday or the day  
20 before yesterday.

21 Q. Why did you take these  
22 photographs?

23 A. I wanted to put in the  
24 communications, the contents in the file,  
25 our communications.

1 Ishaque Thanwalla

2 Q. To the best of your knowledge,  
3 does the photograph accurately represent the  
4 text messages that were from you to Leticia  
5 and from Leticia to you?

6 A. Yes.

7 Q. I'm now going to scroll through  
8 the 37 pages. To be clear, the green  
9 represents you and the white represents  
10 Leticia, each bubble; is that correct?

11 A. Yes.

12 Q. Now, I'm showing you what your  
13 attorney has provided to us which are  
14 conversations between you and Leticia.  
15 Again, the text messages, did you have a  
16 chance to review the documents, those 11  
17 pages.

18 A. Yes.

19 Q. To the best of your knowledge,  
20 do the documents accurately represent the  
21 text messages that you have sent to Leticia  
22 and that you have received from Leticia?

23 A. So far, to the best of my  
24 knowledge.

25 Q. Did you have a chance to compare

1 Ishaque Thanwalla

2 this with your phone?

3 A. No.

4 Q. On the next break, please take  
5 some time and compare it on your phone, and  
6 the question after the break will be: Does  
7 it accurately reflect what you see on your  
8 phone? I will also have some specific  
9 questions about this exhibit.

10 A. Go right ahead.

11 Q. We are now on page 6, and I am  
12 pointing to your attention to the text  
13 message from November 20th of 2018 at  
14 approximately 4:07 p.m.

15 This is a text message from Leticia that  
16 says ``I got to talk to you about something  
17 before it's blown up.``

18 Your response is ``you and your blowup.``  
19 Can you explain what you meant by that, if  
20 you know?

21 A. Maybe she was talking to the  
22 customers unprofessionally.

23 Q. Drawing your attention to the  
24 text message that is dated November 20th,  
25 2018 at 5:40 p.m. It says, from Leticia

1 Ishaque Thanwalla

2 ``can I go home I have really bad cramps and  
3 I can barely move why do you think I was  
4 sitting in the back all day?``

5 Were you aware that Leticia at that time  
6 was pregnant?

7 A. No.

8 Q. Let's go now to page 8.

9 A. Okay.

10 Q. Turning your attention between  
11 pages seven and 81.

12 Obviously we see the paper  
13 format with the PDF in a black and white  
14 photo. My question for you is: do you have  
15 the actual video that is printed on the PDF?

16 A. I don't think so. Everything is  
17 printed, the only thing we are looking at,  
18 that's what I have on my phone and I  
19 provided 100 percent of what is in my phone.  
20 100 percent, not 98 percent, 100 percent of  
21 what I have.

22 Q. If you could just turn your  
23 attention to this video, 11-24-2018 at 5:47  
24 p.m., my question is quite simple: are you  
25 able to check on your phone and see an

1 Ishaque Thanwalla

2 actual video or what is that?

3 A. I can't answer that question,  
4 because I haven't looked at it. I gave them  
5 to my attorney and he downloaded everything  
6 and he gave it to you.

7 MS. TROY: Mr. Kataev, it  
8 appears that this is the  
9 Decipher app, and it's a  
10 black and white photograph of  
11 the actual video. My  
12 question is, can you get me  
13 the actual video?

14 MR. KATAEV: I will see, I  
15 will speak with my client and  
16 you can make a request in  
17 writing, please.

18 Q. Do you have your phone with you,  
19 Mr. Thanwalla?

20 A. Yes.

21 Q. Can you check your November  
22 24th, 2018 conversation with Leticia  
23 Stidhum, and there was a video, to see if  
24 there is a video.

25 MR. KATAEV: Let's go off

1 Ishaque Thanwalla

2 the record.

3 (A discussion was held off  
4 the record)

5 Let the record reflect  
6 that I'm looking at November  
7 24th of 2018, message at 5:47  
8 p.m., and I'm looking at the  
9 image. I see that this is a  
10 picture, but there's no way  
11 to play a video. In fact, on  
12 the bottom I don't see it on  
13 here, on the bottom of this  
14 you can see there was like a  
15 timestamp, and there is a  
16 play button. When you press  
17 the play button, it's just an  
18 image, and it is not capable  
19 of being played back.

20 MS TROY: If the image is  
21 black and white or in color -  
22 -

23 MR. KATAEV: It's in  
24 color. I will reprint it in  
25 color and reproduce the color



1 Ishaque Thanwalla

2 print. We ran out of toner  
3 and we could not print it.

4 MS. TROY: That's fine.  
5 When you look on it, does it  
6 appear bigger or is it  
7 smaller?

8 MR. KATAEV: It's bigger.

9 THE WITNESS: It is bigger  
10 in the sense that you take  
11 the image, it takes up the  
12 full screen instead of just  
13 showing you a portion. It's a  
14 thumbnail, and --

15 MS TROY: Can you provide  
16 the thumbnail to me?

17 MR. KATAEV: No problem.

18 MS. TROY: Just produce  
19 that to me at some point  
20 during this deposition.  
21 We're not going to waste any  
22 more time on this.

23 MS. TROY: I'm going to  
24 ask you to print it out or  
25 send it to me, whichever.

1 Ishaque Thanwalla

2 Q. I'm now going to turn your  
3 attention to the message that follows here,  
4 this is the message from November 25th of  
5 2018 at 3:59 p.m. ``I have so many solid  
6 deals and it's just taking so long for no  
7 reason.''

8 At that time first of all, to your  
9 knowledge, did you become aware of Leticia's  
10 pregnancy.?

11 A. I can't recall. I don't think  
12 so, but I don't think she ever mentioned it,  
13 somebody else mentioned it to me.

14 Q. At that time had Leticia already  
15 announced her pregnancy to either yourself  
16 or other individuals at Hillside Auto  
17 Outlet?

18 A. I don't remember, nor can I say  
19 that she ever told me.

20 Q. Now, we are on exhibit 5 and I  
21 will turn your attention to the message  
22 dated November 25th of 2018 at 4:00 p.m.

23 A. Okay.

24 Q. It says ``okay I am not there at  
25 7:00 every dealership work except me.'' What

1 Ishaque Thanwalla

2 did you mean by that?

3 A. That I am not there at 7:00,  
4 every dealership -- I'm confused. This is  
5 Leticia writing -- no, it's --

6 Q. Does this appear to be you  
7 writing to her?

8 A. I have to see the whole thing  
9 for me to answer that question.

10 Q. Then, on November 25th at 4:00  
11 p.m. it says ``I have one 5,000 down QX60 the  
12 other 2000 down Laredo, all 600+ credit.``

13 A. Okay, I'm there.

14 Q. Let me scroll up for you. This  
15 is the entire thread. Please read it and  
16 let me know when you are ready to answer my  
17 question.

18 A. ``Okay. I am not there at 7:00  
19 every dealership work except me.`` I don't  
20 write well, and maybe I was answering her  
21 differently. I am not there, and I said at  
22 7 o'clock. When I read, I don't read well,  
23 and you can see why I write very limited. I  
24 have -- I am dyslexic when I am writing.

25 Q. Is it fair to say that the

1 Ishaque Thanwalla

2 November 25th, 2018, 359 message from

3 Leticia to you is a complaint?

4 A. Where does it say "complaint?"

5 Q. Sir, you can answer yes or no.

6 A. I don't see a complaint at all,  
7 no.

8 Q. Turning your attention again on  
9 page 8, November 25th, 2018 at 8:07 p.m.  
10 text message, Leticia writes ``what's up I  
11 was in the shower when you called.``

12 THE REPORTER: I didn't  
13 hear that answer.

14 MS. TROY: Can you repeat  
15 your answer?

16 A. Can you repeat the question?  
17 (The reporter read back the last question)

18 Q. Can you describe the text  
19 message for me, and then the court reporter  
20 can just take down his answer. I want him  
21 to read back the question.

22 MR. KATAEV: I don't  
23 understand. Instead of  
24 having him redo his whole  
25 answer, have him continue

1 Ishaque Thanwalla

2 answering.

3 A. What? You didn't ask me a  
4 question.

5 Q. Please relax, I will re-ask the  
6 question. We were talking about the text  
7 message at 8:07 p.m. My question is: is  
8 that when you usually called Leticia?

9 A. Yes, if she had a customer that  
10 she was not there, she called and said that  
11 she would come in late, I would call to see  
12 what was going on with the customer so that  
13 I could handle the customer appropriately  
14 for her.

15 She didn't lose her commission, I could  
16 help her make the deal, she would get paid.  
17 I was very generous with my employees, like  
18 I said.

19 Q. Is it fair to say that you  
20 called Leticia more frequently than you  
21 texted her?

22 A. I can't answer. I have called  
23 every employee if they are not there, if I  
24 have a customer, I call them, yes.

25 Q. Earlier before we were cut off

1 Ishaque Thanwalla

2 by your attorney, didn't you say that you  
3 called more frequently than you texted  
4 Leticia Stidhum?

5 A. That is not -- I said that I  
6 called more frequently, everyone because I  
7 don't text well. You can see that I don't  
8 make sense on my own wording.

9 Q. Turning to the bottom of page 8,  
10 the beginning of page 9 it is dated November  
11 28th of 2018 at 8:09 p.m. It says ``the call  
12 keeps dropping. I am going to call him  
13 now.``

14 Is it fair to say that Leticia is  
15 working outside of business hours?

16 A. If it's her customer and she is  
17 not at work, it's likely she did not show up  
18 to work, not her day off. If she could no  
19 longer show up, I would call her, to call  
20 the customer and she was supposed to be  
21 there, and I would say ``you should show up  
22 too.``

23 Q. Is it fair to say that at the  
24 time when she texted you at 8:09 p.m.,  
25 during that time, that she called the

1 Ishaque Thanwalla

2 customer, that it was after store hours?

3 A. Because she probably was  
4 supposed to say that she is going to call  
5 him, probably confirming. It was probably  
6 that if she says that she was going to go  
7 home, it's a hard deal for her, why should  
8 she lose money if she was going to call her  
9 -- I probably said ``call him to remind her,  
10 and there's nothing wrong with that. I am  
11 aggressive, and she is aggressive enough to  
12 make every deal. That's why I loved her,  
13 she was a very good salesperson.

14 Q. You are emphasizing that she was  
15 a good salesperson as opposed to a good  
16 employee. To you, what is the difference?

17 A. A good salesperson, she was my  
18 employee.

19 Q. What part of the employee role  
20 did she play as a salesperson so that she  
21 was a great salesperson --

22 A. Meaning that she was a good  
23 employee, simply put.

24 Q. Let's take a look at the text  
25 message on page 9 where it is dated November

1 Ishaque Thanwalla

2 30th, of 2018 at 3:17 p.m. Leticia says ``I  
3 am really not feeling well I feel nauseous  
4 and I was trying to just hang out but I feel  
5 hot and I feel my stomach turning.``

6 Is it fair to say that at this time you  
7 knew about the pregnancy?

8 A. Maybe not, I can't recall. If  
9 she was pregnant she would've texted someone  
10 anyway, and if I saw any sales, if I saw  
11 anything that's said that she was nauseous  
12 ``I am pregnant,`` though I did not. Nowhere  
13 in her conversations have I ever seen her or  
14 seen any messages that show, it says ``I am  
15 nauseous because I am pregnant.`` She is  
16 nauseous, and she has done that numerous  
17 times. I can't recall if she told me or she  
18 did not tell me whether she was pregnant.

19 Q. She did not tell you in person  
20 that she was pregnant?

21 A. I cannot recall that because I  
22 don't think so. I don't think she told me,  
23 but I got awareness of this from somebody  
24 else and I can't exactly recall it at this  
25 time who told me. Maybe her friend Joanna,



1 Ishaque Thanwalla

2 but I don't know.

3 Q. Please turn your attention to  
4 page 9, the text message dated December 3rd  
5 of 2018 at um 11:21 a.m. Then that shows  
6 your response at 11:22 a.m.

7 A. Okay.

8 Q. When you said that ``in meeting  
9 be there in 2 hours,'' where were you  
10 meeting; was at Hillside Auto or somewhere  
11 else?

12 A. Maybe a meeting with my  
13 partners.

14 Q. By ``partners,'' do you mean 3  
15 other individuals who you mentioned were  
16 also shareholders?

17 A. Yes. Or, I could be in a  
18 meeting with -- someone for a personal  
19 meeting or maybe I am in a -- in my doctor's  
20 office. I can't answer that question  
21 exactly.

22 Q. How often would you have  
23 meetings with your partners?

24 A. Once or twice a month.

25 Q. What would those meetings touch

1 Ishaque Thanwalla

2 upon?

3 A. Sales, how are we doing in  
4 sales, because it's my job to make sure that  
5 they are up-to-date about what is going on  
6 there and my business.

7 Q. As the general manager, did you  
8 receive a salary?

9 A. I received percentage, yes.

10 Q. Meaning that you received a  
11 percentage of the profits; is that correct?

12 A. Yes.

13 Q. Is that percentage the same or  
14 different from 25 percent?

15 A. 25 percent is my partnership.

16 Q. The question is how about for  
17 the profits?

18 A. It's my percentage, it's my  
19 privacy not to answer that question,  
20 Emanuel.

21 MR. KATAEV: We are going  
22 to object on the grounds of  
23 confidentiality under Rule  
24 30. The plaintiff has  
25 previously requested all

1 Ishaque Thanwalla

2 matters of financial  
3 information, and the Judge  
4 refused to comply with the  
5 production of that  
6 information. So, I am  
7 directing the witness not to  
8 answer that question.

9 MS. TROY: I am not asking  
10 for financial information. I  
11 am asking for the percentage  
12 of profits that were given to  
13 him. I am not asking about  
14 the sales at Hillside Auto.

15 MR. KATAEV: Objection  
16 Asked and answered. You can  
17 answer as to the percentage.

18 A. I can't recall what the  
19 percentage is, I was getting -- it's the  
20 same percentage that I was getting today,  
21 there is no difference between that day and  
22 today's date.

23 Q. Turning your attention to the  
24 text message dated December 12th, 2018 at  
25 6:04 p.m.

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2 ''I am really not feeling well. My  
3 stomach is turning and I feel extremely  
4 nauseous and I keep feeling like I need to  
5 puke I can't stay any longer I need to lay  
6 down.''

7 A. You can see in her question that  
8 she probably left because she is sitting  
9 right in front of my window. I said  
10 probably ''go.'' But, anyway, you see no  
11 mention of pregnancy.

12 Q. Is it fair to say that at that  
13 point you knew of Leticia's pregnancy?

14 A. I cannot answer that question  
15 because I don't recall anything she is  
16 mentioning. If she would've mentioned it,  
17 she would've mentioned it in the text. You  
18 can see that she likes to turn everything --  
19 put everything in writing, and she should  
20 have mentioned something somewhere.

21 You can see from page 1 to whatever the  
22 last page is, whatever you have 37 or 27,  
23 you don't see anywhere in her conversations  
24 that she is saying that she is pregnant.  
25 So, no, I did not know if she had mentioned

1 Ishaque Thanwalla

2 it, I don't recall.

3 Q. Is it your understanding, and  
4 don't take this the wrong way, but is it  
5 your understanding that a pregnant woman  
6 needs to remind you of her pregnancy through  
7 text?

8 MR. KATAEV: Objection as  
9 to argumentative. You can  
10 answer the question.

11 A. She at least one minute -- once  
12 she was pregnant, she never did say, so she  
13 didn't need to remind me. I don't think I  
14 remember her mentioning to me that she was  
15 pregnant.

16 Q. Now let's turn our attention to  
17 page 10 and take a look at the text message  
18 dated December 12th, 2018 at 6:37 p.m.  
19 Please read it and let me know when you are  
20 done. Please read it to yourself.  
21 (The witness peruses).

22 MR. KATAEV: The witness  
23 has requested that I read the  
24 message to him.

25 (Mr. Kataev read the text

1 Ishaque Thanwalla

2 message as requested to the  
3 witness)

4 Q. There is also a text message on  
5 12-12- 2018 at 6:39 p.m.

6 MR. KATAEV: Let the  
7 record reflect that I have  
8 read the first text message  
9 and let the record also  
10 reflect that I am now reading  
11 the second text message to  
12 the witness.

13 A. I --

14 MR. KATAEV: There is no  
15 question pending.

16 (The attorney reads it to the  
17 witness.)

18 Q. What is your response?

19 A. Probably brought into my office  
20 and said that I wanted to talk to her about  
21 what seemed to be the trouble and then we  
22 communicated.

23 Q. Do you recall what that  
24 conversation was like?

25 A. I can't recall. The only thing I

1 Ishaque Thanwalla

2 can see from the content is it says that the  
3 customer is rushing her, the customer or she  
4 is rushing the customer or the customer is  
5 rushing her. I said ``slow down the  
6 customer.'' ``If you want to make the deal,  
7 you have to slow down the customer.'' Then,  
8 I wanted her to make the deal, to slow the  
9 customer down and she said ``no rush.'' Everything is okay. What happened, when you  
10 do it fast, you cut corners and you make  
11 mistakes.  
12

13 Maybe I brought her into my office and  
14 I told her, I disciplined her, like I  
15 mentioned maybe one or two times I guess  
16 that was one of the times that I disciplined  
17 her. I told her ``you need to slow down the  
18 customer, slow down yourself to make it the  
19 right way of making the deal instead of  
20 losing a deal.''

21 Q. Is it correct that the  
22 particular deal that was referenced in the  
23 first text message went through?

24 A. Yes. I read that because I  
25 disciplined her and told her to slow down

1 Ishaque Thanwalla

2 the customer.

3 Q. To your knowledge, did that  
4 happen before or after the pregnancy  
5 announcement, the alleged pregnancy  
6 announcement?

7 A. I don't recall her pregnancy  
8 announcement, so I can't allege anything.

9 Q. Besides telling her to slow the  
10 customer down, do you recall what else was  
11 said during that night on December 12th,  
12 2018?

13 A. I don't recall.

14 Q. Turning your attention now to  
15 the text message dated January 7th of 2019  
16 at 4:13 p.m. Leticia writes ``I left for the  
17 day tomorrow we need to talk because this  
18 place has been a shit show since you left.'' Your  
19 response to her at 10:17 a.m. which is  
20 on page 10 continuing onto page 11 is  
21 ``okay.''

22 A. She asked me a question on the  
23 7th, and I was probably into the flight or  
24 getting out of the flight. When you come  
25 off of a 24-hour long flight, you sleep.



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2 You have jet lag, maybe my phone was shut  
3 off. And I can't answer that, I can't  
4 recall everything.

5 Q. Let's scroll down now to page  
6 11. I'm going to now draw your attention to  
7 the text message from January 10th, 2019 at  
8 1:24 p.m. Please read it and let me know  
9 when you are finished reading it.

10 (The witness peruses and  
11 says, ``she's telling me that  
12 she threw up and she can't  
13 take the pressure in the car  
14 business'')

15 MS. TROY: Please read  
16 back the question again.

17 (The reporter read back the  
18 last question.)

19 A. Okay.

20 Q. Now that you have finished  
21 reading it --

22 MR. KATAEV: Do not  
23 interrupt me.

24 MS. TROY: What did you  
25 say to the witness?

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2 MR. KATAEV: Please let  
3 the record reflect that my  
4 instruction to the witness  
5 was to listen to the  
6 question, and if a question  
7 is pending, to answer that  
8 question. If there is no  
9 question, there is nothing to  
10 be said. Please proceed.

11 Q. The question is: when you  
12 received this text message from Leticia,  
13 were you aware of her pregnancy?

14 A. Like I said, I can't recall  
15 that, I can't answer that question. Nowhere  
16 in that is mentioned that she was pregnant.  
17 Maybe she mentioned it to me, and it went in  
18 one ear and came out the other. She was  
19 probably talking while she was pregnant to  
20 me, maybe I was really busy doing something  
21 else when she mentioned it to me. I can't  
22 answer that question.

23 Q. Please read the text message  
24 from January 17th, of 2019 at 8:27 p.m. and  
25 let me know when you are done.

1 Ishaque Thanwalla

2 A. You want me to read it?

3 Q. You can read it to yourself.

4 A. What was the question?

5 Q. Let me know when you are done  
6 and I will ask you a question.

7 MR. KATAEV: Please read  
8 it and tell her when you are  
9 done reading it.

10 THE WITNESS: Okay, I read  
11 it. What's your question?

12 Q. Was that a complaint for \$100 in  
13 old wages?

14 MR. KATAEV: Objection.  
15 It assumes facts not in  
16 evidence. You can answer.

17 A. Let me answer a complete answer.  
18 We never hold a week's pay to begin with,  
19 and according to my records, she left on the  
20 10th. Yes, it shows the date of the last  
21 pay date was the 14th on ADP records,  
22 according to my records, she left on the  
23 10th and there was \$300 salary that she was  
24 supposed to get for the whole three. She  
25 did not work the whole week, so there was

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2 \$100 short on her pay because we had an  
3 employee that said how many days, they  
4 worked and how much pay she was supposed to  
5 get. Based on that, it shows in her own  
6 writing on my text message that we only took  
7 \$100 owed to her, a hundred back and we did  
8 not. Does that answer your question?

9 Q. Please read the message from  
10 January 17th of 2018 at 8:30 p.m. and let me  
11 know when you are done.

12 (The witness peruses).

13 A. Okay. It can't be -- it looks  
14 like somebody coached her, it wasn't 1-17 at  
15 8:30 p.m. She bought a car for me, not  
16 herself, her grandmother bought a car. She  
17 did not give me the complete documents. We  
18 didn't make any money because she didn't  
19 give me any down payment. She gave a down  
20 payment, but not a complete down payment,  
21 that's what I meant. So, it looks like  
22 somebody coached her, 60 hours and 7 days?  
23 Whatever you can see, how many days she  
24 called in sick or left early and had her  
25 days off.

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2 Q. Is it true that on days that she  
3 would take off, she would make them up?

4 A. I can't recall, she hardly did.

5 Q. In other words, the question is,  
6 if she took off for a day, would she make it  
7 up on her free days and come to work at  
8 Hillside Auto Outlet?

9 A. She worked 7 days, which she  
10 never did, she said she worked 7 days, but  
11 she worked five days a week. Sometimes she  
12 came to deliver a car to a customer, that  
13 was on her prerogative because she was a  
14 commissioned salesperson.

15 Q. To be clear, the text message  
16 that you are looking at does not say for  
17 ``seven days,`` it says ``for seven months.``

18 A. Whatever. I told you that I am  
19 dyslexic when I read.

20 Q. That's okay. We will either  
21 have myself or Emanuel read it out for you,  
22 how about that?

23 A. Okay.

24 Q. I'm going to show you  
25 Plaintiff's Exhibit 7 which is the Decipher

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chat conversation with Ali. First, can you tell me, to the best of your knowledge if this comports with your understanding in terms of it being an accurate representation of the WhatsApp conversation you've had with Ali?

A. Yes.

Q. I'm going to show you Plaintiff's Exhibit 7 which is the Decipher chat conversation with Ali. First, can you tell me to the best of your knowledge, if this comports with your understanding in terms of it being an accurate representation of the WhatsApp conversation you had with Ali?

A. Yes.

Q. If you turn your attention to this specific exchange, and I will read it for you, this is from December 27th of 2018 at 11:05 a.m. Ali texted ``your baby is having a daughter,`` with two emojis. Then, you text him back ``which one?`` Then, he texted you at 12:13 p.m. on 12-27 saying ``Leticia.`` You texted him back saying ``I

1 Ishaque Thanwalla

2 know. ' '

3 Do you recall this exchange having  
4 happened, and it's a yes or no question?

5 A. Yes. May I give you a complete  
6 answer?

7 MR. KATAEV: Yes, you may  
8 go ahead.

9 MS. TROY: It is --.

10 MR. KATAEV: He wants to  
11 complete his answer.

12 MS. TROY: It's a yes or  
13 no question. He completed his  
14 answer.

15 MR. KATAEV: The answer is  
16 not a yes or no.

17 MS. TROY: You can follow  
18 up with your direct.

19 THE WITNESS: My complete  
20 answer would be --

21 MS. TROY: Fine, go ahead.

22 A. (Continuing) My complete answer.

23 I told you that somebody mentioned that she  
24 was on the call and said ``your daughter is  
25 pregnant.`` Yes, at that time and then I

1 Ishaque Thanwalla  
2 probably followed up with it.

3 MS. TROY: I appreciate  
4 that additional content.  
5 Just so that we are clear, it  
6 is a courtesy to let you add  
7 whatever you want to add. If  
8 it's a yes or no question, it  
9 is complete when you say ``yes  
10 or no,`` anyway. It's not that  
11 big of a deal. Let's take a  
12 look now at Plaintiff's  
13 Exhibit 6.

14 This one is the WhatsApp conversation  
15 you've had with Leticia. Can you just  
16 confirm to the best of your knowledge if it  
17 comports with your understanding that it is  
18 true and accurate copy of your conversations  
19 with Leticia on WhatsApp before the 4 pages?

20 A. Four pages? Correct.

21 MS. TROY: I believe your  
22 attorney will read it and I  
23 will scroll through it.

24 MR. KATAEV: That will  
25 help him answer the question,



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2 he has four pages in front of  
3 him.

4 Please take a look through  
5 the whole thing and see if it  
6 is comports with your  
7 conversation.

8 (The witness complies and  
9 peruses)

10 THE WITNESS: Nothing.

11 MR. KATAEV: I said that  
12 the witness is reviewing a  
13 hard copy of the exhibit.

14 Q. The question that is pending is  
15 whether, to your understanding, this is an  
16 accurate and complete representation?

17 A. As to my ability, yes.

18 Q. The question is whether it's an  
19 accurate and complete representation of the  
20 WhatsApp conversation that you had on your  
21 phone.

22 A. To the best of my ability, yes.

23 Q. Is it fair to say that you and  
24 Leticia have the WhatsApp conversation  
25 because you were in Pakistan?

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2 A. I would say yes, I guess

3 December 20th.

4 Q. I am now going to turn your  
5 attention to page 2, specifically to the  
6 text message that is from December 27th of  
7 2018 at 8:30 p.m. If you want, you can have  
8 your attorney read it for you also as well.

9 THE WITNESS: Emanuel?

10 MR. KATAEV: Let the  
11 record reflect that I am  
12 reading this message to the  
13 witness.

14 MS. TROY: It's not this  
15 part, it's the highlighted  
16 part.

17 MR. KATAEV: Let the  
18 record reflect that I will be  
19 reading the message time  
20 stamped at 8:30 and 8:32 p.m.  
21 to the witness, to Ishaque.

22 (The attorney complies)

23 Q. The question for you is: does  
24 this refresh your recollection about  
25 Guzman's treatment of Leticia while you were

1 Ishaque Thanwalla

2 out?

3 A. This is a conversation about  
4 Leticia, this is Leticia because Guzman,  
5 there is no conversation that Leticia had a  
6 problem with Guzman. It looks like he was  
7 talking about David, like she was  
8 complaining about that.

9 Q. The question for you is: does  
10 this refresh your recollection about  
11 Guzman's treatment of Leticia while you are  
12 out?

13 A. There is no conversation about  
14 Leticia. This is Leticia, previously,  
15 because Guzman, there is no conversation  
16 that Leticia had a problem with Guzman.  
17 It's David, it looks like she talked about  
18 David, like she's complaining about this.  
19 About why Guzman took the Range Rover, and  
20 maybe she didn't like that, that Guzman --  
21 since Ali started, they probably -- I can't  
22 answer that question. Ali probably changed  
23 her mind now and she is again Guzman, she  
24 doesn't like that, and that is Guzman is  
25 trying to do his job, it looks like that to

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2 me because the one who had gotten the paper,  
3 Ali should have gone and given it in order  
4 for him, because he had seniority. He's  
5 trying to get everything organized and Ali  
6 is sitting and she is just complaining.  
7 That's what I understand in this message.

8 Q. When you received this message,  
9 did you respond or call Leticia?

10 A. I have no idea. I can't recall.

11 Q. If you did call her, would it be  
12 reflected on the WhatsApp?

13 A. Yes, the chat room. I don't  
14 know if I called her because I was back home  
15 and I probably didn't even see this message  
16 until a day later. I can't answer that  
17 question.

18 Q. Is it fair to say that this text  
19 message that was just read aloud to you did  
20 not just concern David but it concerned the  
21 deal that Leticia had as well?

22 MR. KATAEV: Objection.

23 You can answer.

24 A. Does not look like it, it was  
25 David's deal and he was trying to do the DMV

1 Ishaque Thanwalla  
2 and the DMV takes time, as I mentioned  
3 previously to you. Then, they ran the  
4 Carfax and I don't know what you call that  
5 paper. There is a lot addressed like I  
6 said, nothing goes perfectly. If you have  
7 an internet, is if it's not up or it's slow,  
8 maybe the DMV internet is down. Happens all  
9 the time.

10 Q. Did David Enrique from time to  
11 time partner with Leticia?

12 A. Sure, they went out and smoked  
13 weed all the time. That's the problem that I  
14 had with --

15 Q. I don't mean partner in that  
16 sense but I appreciate your answer.

17 Let's backtrack for a second, and when  
18 the deposition is over and then after the  
19 case is over, then we can talk about  
20 whatever you want to talk about.

21 Right now, please focus on the question.  
22 I mean partner in the sense of was he ever  
23 partnered with Leticia in terms of any car  
24 sales at Hillside Auto Outlet during her  
25 employment with Hillside Auto Outlet?

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2 A. Let me understand this  
3 correctly. You are telling me that Leticia  
4 would give half of her commission to David,  
5 is that what you are asking me?

6 Q. No. I'm not asking you that.  
7 I'm asking you, were there times when two  
8 car salesmen would partner to sell a car;  
9 it's a yes or no question.

10 A. It's not a yes or no question.  
11 No, they would not partner up, sometimes on  
12 occasion Leticia would give a complete  
13 answer and sometimes in the situation, they  
14 would deliver, Leticia's car and Leticia  
15 would deliver David's car on his days off or  
16 on her days off. They would do each other a  
17 favor, not partner-up, they would do each  
18 other a favor.

19 Q. Let's focus then on the part of  
20 the text message where it says ``I got this  
21 customer looking to pay cash for the number  
22 4 Carfax and we have no paper.``

23 Is it accurate to say that you  
24 understood that portion of the text message  
25 when you received it to be that Leticia had

1 Ishaque Thanwalla

2 her own customer that was looking to pay  
3 cash; it's a yes or no question?

4 A. It's not a yes or no question.

5 We may have ran (sic) out of paper and  
6 Leticia was the salesperson she could have  
7 opened the screen and showed the Carfax on  
8 the computer screen and showed it to let the  
9 customer see it while the customer was  
10 looking at it. Somebody could have gone and  
11 gotten the paper. It appears that the  
12 customer had to go out and get the paper.

13 Q. When you talked about  
14 partnering, was there a time when Leticia  
15 would run the credit or David would run the  
16 credit?

17 A. How can they run the credit when  
18 they had no access to run the credit, nor  
19 was she authorized to run the credit? It is  
20 the manager's job, management's job which is  
21 Guzman and Ali. Supposing if we could show  
22 that Leticia did run the credit for David,  
23 it's the customer I guess.

24 Q. Is it fair to say that on  
25 December 27th of 2018 you were not in the

1 Ishaque Thanwalla

2 country?

3 A. What?

4 Q. In 2018, December 27th of 2018,  
5 the same date as the text message.

6 A. Yes, I wasn't in the country.

7 Q. Is it fair to say that David  
8 could not have run his own credit without  
9 the help of Guzman or some other individual  
10 who had the authority to access the  
11 DealerTrak system?

12 A. Your question is could David  
13 have run his credit? David could never run  
14 a customer's credit, nor could Leticia, nor  
15 could any other sales person could run a  
16 credit. It is the manager's job, and I  
17 would have more than two available -- if  
18 they are not available, I'm going to take  
19 the name Ali and Guzman. If they're both  
20 busy or somehow for any reason, there is no  
21 finance manager, they would have the  
22 authority to do that. Does that answer your  
23 question?

24 MR. KATAEV: Let's go off  
25 the record.



1 Ishaque Thanwalla

2 (A discussion was held off  
3 the record).

4 We are back on the record  
5 at 4:39 p.m.

6 Q. Let's mark. Plaintiff's Exhibit

7 8.

8 (Plaintiff's exhibit 8 marked  
9 for identification)

10 MS. TROY: Plaintiff's  
11 Exhibit 8 will be the  
12 Verification of Ishaque  
13 Thanwalla.

14 Q. I am going to show it on the  
15 screen, Plaintiff's 8 for identification.

16 MR. KATAEV: I'm going to  
17 print it.

18 MS. TROY: While you are  
19 at it, you might as well  
20 print the other stuff as  
21 well. The responses to the  
22 document request.

23 MR. KATAEV: Okay.

24 MS. TROY: Let's mark  
25 plaintiff's 9 and 10 as well.

1 Ishaque Thanwalla

2 (Plaintiff's Exhibit 9 and 10  
3 marked for identification)

4 MS. TROY: Plaintiff's 9  
5 is the Verified Response to  
6 Interrogatories, the regular  
7 Interrogatories. Plaintiff's  
8 10 is the final Supplemental  
9 Responses.

10 Q. While your attorney is doing  
11 that, I'm just going to ask you some other  
12 questions about Serge meaning Serge Zanan,  
13 correct?

14 A. Yes, something like that.

15 Q. Back on Plaintiff's Exhibit 2,  
16 this is the Declaration of Serge Zanan,  
17 plaintiffs 2 and then on page 72, which is  
18 the same as defendant's document production  
19 72.

20 I'm going to ask you to read paragraph  
21 one and ask you if this refreshes your  
22 recollection as to when he started working  
23 at Hillside Auto Outlet.

24 MR. KATAEV: Just for the  
25 record, I printed this and

1 Ishaque Thanwalla

2 I'm going to give all of this  
3 to the witness so that he has  
4 the full set so that he can  
5 read the whole thing.

6 Let the record reflect  
7 that I have given the witness  
8 the Declaration of Serge  
9 Zanan, and I'm asking if he  
10 could read the whole thing.

11 MS. TROY: Let me know  
12 when you are done reading it.  
13 (The witness peruses)

14 MR. KATAEV: I'm  
15 confirming to him to read  
16 everything that is stapled  
17 here, all 4 of the boxes to  
18 the Interrogatories and  
19 document requests are in  
20 front of the witness.

21 Do you want to repeat your  
22 question? What was your  
23 question?

24 Q. My question is, however,  
25 paragraph 1 of the Declaration, does it

1 Ishaque Thanwalla

2 refresh your recollection as to when Serge  
3 started to work at Hillside Auto was at the  
4 end of 2018?

5 A. Probably started in 2018.

6 Q. Is that accurate to the best of  
7 your knowledge?

8 A. I can't answer, but it says so,  
9 maybe it's accurate.

10 Q. Was he a finance manager or a  
11 finance and insurance representative?

12 A. The finance manager which we  
13 call finance and insurance because they do  
14 sell warranties and that is why they call it  
15 ``finance and insurance.``

16 Q. So, finance and insurance  
17 representative is the same as a finance  
18 manager or is it different?

19 A. Yes, the same.

20 Q. When was your last contact with  
21 Guzman?

22 A. A couple of weeks ago.

23 Q. During that contact, did you  
24 talk at all about this case, the present  
25 case?

1 Ishaque Thanwalla

2 MR. KATAEV: Objection  
3 based on attorney/client  
4 privilege.

5 MS. TROY: How is it  
6 attorney/client privilege if  
7 it is between him and Andris  
8 Guzman?

9 MR. KATAEV: He learned --  
10 if you didn't interrupt, you  
11 would've heard me say that I  
12 was present during that  
13 conversation. I am  
14 instructing the witness not  
15 to answer that question.  
16 Please proceed.

17 Q. When was the last contact you  
18 had with Andris Guzman without your attorney  
19 being present?

20 A. Without my attorney being  
21 present? I didn't have any -- I didn't have  
22 any contact with him in a long time.

23 Q. How about with Ronald M. Baron?

24 A. A year-and-a-half ago or a year  
25 ago.

1 Ishaque Thanwalla

2 Q. How about Jory Baron?

3 A. I saw him about two or three  
4 weeks ago.

5 Q. Was that in the presence of your  
6 attorney or outside the presence of your  
7 attorney?

8 A. He is my partner.

9 Q. The question is yes or no, was  
10 it with your attorney or not with your  
11 attorney?

12 A. Not with my attorney, not with  
13 Jory.

14 Q. What did you talk to him about?

15 MR. KATAEV: Objection,  
16 asserting a common interest  
17 prejudice objection. Jory  
18 Baron is one of the  
19 witnesses, one of the  
20 defendants in this case, and  
21 if you discussed anything  
22 about this case I am  
23 instructing the witness not  
24 to answer that question.

25 MS. TROY: You can answer

1 Ishaque Thanwalla

2 that question subject to that  
3 objection.

4 MR. KATAEV: In other  
5 words, if you talked about  
6 this case, don't answer. If  
7 you talked about something  
8 else, you can answer.

9 A. We talked about something else,  
10 we did not talk about this case.

11 Q. What did you talk about?

12 A. Business.

13 Q. When you say ``business,`` do you  
14 mean Hillside Auto Outlet specifically?

15 A. Correct. That is the only  
16 business he owns with me.

17 Q. I'm showing you on the screen  
18 the Verification to the Interrogatories, the  
19 Supplemental Interrogatories which your  
20 attorney has printed for you. Let me know  
21 when to scroll down, it is one page.

22 (The witness peruses)

23 THE WITNESS: Okay.

24 Please back up a little bit.

25 MS. TROY: Okay.

1 Ishaque Thanwalla

2 THE WITNESS: That is

3 good.

4 Q. The question I have for you is:  
5 do you recognize your signature?

6 A. Yes.

7 Q. To the best of your knowledge,  
8 is everything contained in the  
9 Interrogatories and the Supplemental  
10 Interrogatories correct and true?

11 A. Yes.

12 Q. When was this document signed?

13 A. I don't remember the date. It  
14 says ``February of 2023.``

15 MR. KATAEV: I will make

16 the representation that it

17 was on the same day that you

18 received it.

19 Q. Prior to signing it, did you  
20 review the Interrogatory Responses?

21 A. Yes.

22 Q. Did you have a conversation with  
23 Deana Jennings?

24 A. Right.

25 Q. Did you have a conversation with



1 Ishaque Thanwalla

2 her?

3 A. Yes.

4 Q. How long was that conversation?

5 A. I can't recall.

6 Q. When did that conversation take  
7 place?

8 A. I don't remember her ever asking  
9 me to have a conversation.

10 Q. I understand that your attorney  
11 asked you to have the conversation. My  
12 question is when?

13 A. Before signing of the paper.

14 Q. You had the conversation with  
15 whom, with your attorney or with Deana  
16 Jennings?

17 A. Your question was about  
18 conversations with Deana Jennings and I said  
19 ``yes.``

20 Q. You had a conversation with her  
21 right before you signed or when?

22 A. Right before.

23 Q. What was the content of that  
24 conversation?

25 MR. KATAEV: Objection.

1 Ishaque Thanwalla

2 Based on the same objection,  
3 the common interest privilege  
4 objection. To the extent  
5 that you and Deana Jennings  
6 discussed this case, I  
7 instruct you not to answer  
8 the question. If you  
9 discussed something else, you  
10 may answer.

11 A. We discussed the case.

12 Q. Is it fair to say that any of  
13 the Responses pertaining to Hillside Auto  
14 Mall that you don't have personal knowledge  
15 about that?

16 A. This is a separate company, I am  
17 not part of Hillside Auto Mall. So I don't  
18 know what goes on there, it's not my  
19 business.

20 Q. I understand that your  
21 Interrogatories had information about  
22 Hillside Auto Mall. My question is: to the  
23 extent that your answers included  
24 information about Hillside Auto Mall, are  
25 you saying that you did not have personal

1 Ishaque Thanwalla

2 knowledge with respect to those?

3 A. I have no interest in Hillside  
4 Auto Mall, so I had no conversations on  
5 Hillside Auto Mall. My business is Hillside  
6 Auto Outlet. Anything pertaining to  
7 Hillside Outlet is part of my answer.

8 Q. Who is Susan Zhivo Z-H-I-V-O.

9 A. She is my controller.

10 Q. Susan Zhivo Z-H-I-V-O, is that  
11 the Susan that you mentioned earlier that  
12 you didn't remember her last name?

13 A. Yes. I call her Susan ``Z.``

14 Q. Besides yourself, are there any  
15 other individuals who are responsible for  
16 determining the pay and the hours of  
17 Hillside Auto employees?

18 A. Hillside Auto or Hillside  
19 Outlet?

20 Q. We can do Hillside Auto Outlet  
21 employees.

22 A. Okay, what was your question  
23 again?

24 Q. Besides yourself, was anyone  
25 else responsible for determining

1 Ishaque Thanwalla

2 compensation or hours?

3 MR. KATAEV: At Hillside

4 Auto Outlet?

5 MS. TROY: We can start

6 from there.

7 A. Hillside Auto Outlet, Susan is

8 my controller and she does the payroll.

9 Then, before Susan it was Deana and before

10 Susan, Deana Jennings, yes.

11 Q. During the plaintiff's

12 employment with Hillside Auto Outlet, you

13 were saying that in addition to yourself,

14 Deana and Jeanique also determined the

15 compensation and hours?

16 A. And Asha A-S-H-A as well.

17 Q. Asha is the assistant office

18 manager, right?

19 A. Correct.

20 Q. In terms of the amount of time

21 it takes for Hillside Auto salespeople to

22 hear back from the lender once an

23 application was submitted, how long would

24 that timeframe be?

25 A. Now you are questioning -- it's

1 Ishaque Thanwalla  
2 actually a different thing, you were talking  
3 about do we play a role, are you asking  
4 about the bank?

5 Q. Yes.

6 A. You changed subjects, I just  
7 want to make sure we stay on the same path.  
8 Your question was how long it takes for the  
9 bank to reply back, is that your question?

10 Q. Right, how much time?

11 A. It all depends.

12 Q. Do you have a range?

13 A. The range is between 20 minutes  
14 to an hour, hour-and-a-half or maybe two.

15 Q. Is it true that most of your  
16 customers do not have excellent credit?

17 A. Most of our geographic location,  
18 we do not have the greatest credit.

19 Q. Do you recall your attorney  
20 asking my client a question about racial  
21 profiling of the customers; did that happen  
22 at Hillside Auto Outlet?

23 A. What do you mean by ``racial  
24 profiling?''

25 Q. Let's try to do this and address

1 Ishaque Thanwalla

2 it in the shortest way we can. In terms of  
3 the person who does not have good credit or  
4 that person has good credit that happens on  
5 your watch.

6 Let's look at it this way the  
7 person that person does not have good credit  
8 or that person has good credit, that happens  
9 under your watch, right?

10 A. Let me put it this way. I have a  
11 very extensive training in the car business.  
12 One thing about me, I don't judge a book by  
13 its cover. We do not judge. You can be any  
14 color, any race, any religion, and we treat  
15 them equally. We don't have one -- only one  
16 identity that we look at.

17 Q. Is it true that you hold them to  
18 the same standard?

19 A. Yes, I do. We only have one  
20 identity. I am very strong about that.

21 Q. In terms of credit, no one is  
22 just turned away because they look a certain  
23 way, the credit has to be run, correct?

24 A. Correct, the credit has to be  
25 run if they want to buy on credit, if they

1 Ishaque Thanwalla  
2 want to pay cash, we don't have to run it.  
3 But, we still need to get the social  
4 security for the tax form, but no.

5 Q. You mentioned in your  
6 Supplemental Interrogatories that you have a  
7 secondhand dealer's license and certificate  
8 of authority; is that correct?

9 A. Secondhand dealer license, yes.

10 Q. Do you also have a certificate  
11 of authority?

12 A. Authority for what?

13 Q. I don't know, that's what you  
14 wrote.

15 A. An authority to issue DMV, yes.

16 MS. TROY: Demand number  
17 9, it will be the secondhand  
18 dealer license and  
19 certificate of authority for  
20 161-10 Hillside Auto Avenue,  
21 or for you personally.

22 MR. KATAEV: I am going to  
23 place that response in front  
24 of the witness.

25 MS. TROY: That is fine.

1 Ishaque Thanwalla

2 I am also asking or  
3 requesting the Declaration of  
4 Serge.

5 MR. KATAEV: Should I read  
6 this --

7 MS. TROY: Not all  
8 questions require him to read  
9 that, but he can read it if  
10 it helps him.

11 MR. KATAEV: This is the  
12 Supplemental Response and  
13 Interrogatory number 9?

14 MS. TROY: Correct. You  
15 can read it to him and let me  
16 know when you are done  
17 reading it.

18 (The witness peruses)

19 THE WITNESS: Okay.

20 Q. I am asking you if you  
21 identified these documents, they have not  
22 been turned over yet, please turn it over.  
23 That is another demand.

24 MR. KATAEV: Documents are  
25 being requested.



1 Ishaque Thanwalla

2 MS. TROY: The secondhand  
3 dealer license and the  
4 certificate of authority that  
5 was mentioned and referred to  
6 was never produced.

7 MR. KATAEV: You never  
8 made a demand for it,

9 MS. TROY: I'm making a  
10 post-demand request for it.

11 MR. KATAEV: Put it in  
12 writing and we will respond.

13 Q. Mr. Thanwalla, can you just take  
14 a quick look at the two other documents that  
15 your attorney has printed for you, which is  
16 the documents, it's document request  
17 responses and the supplemental responses.  
18 Please just take a look at the document and  
19 can you just confirm for me that it is  
20 accurate and complete to the best of your  
21 knowledge.

22 A. I've been through this document  
23 previously, it's the same document, yes.

24 Q. Just to confirm that both  
25 document requests and responses as well as

1 Ishaque Thanwalla

2 the supplemental responses, there were two  
3 documents that you looked at, correct?

4 MR. KATAEV: Let's go off  
5 the record.

6 (A discussion was held off  
7 the record)

8 A. Okay, looking at the same  
9 thing that I looked at yes.

10 Q. Just to be clear, the document  
11 production responses are the 38 page  
12 document, that, and let's start with that,  
13 you said that you reviewed the document and  
14 it is complete, it is accurate to the best  
15 of your knowledge, correct?

16 A. To the best of my ability, yes.

17 Q. Then, do you see the five-page  
18 document?

19 A. Yes.

20 Q. Could you say the same for that  
21 5-page document that it is true and complete  
22 to the best of your knowledge?

23 A. To the best of my knowledge,  
24 yes.

25 Q. Now, I'm going to show you this

1 Ishaque Thanwalla  
2 on the screen, and we are looking at  
3 Plaintiff's Exhibit 10 for identification.

4 Q. We are looking at plaintiff's  
5 Exhibit 10 for identification. I'm just  
6 going to point your attention to a couple of  
7 different sections and I will have a couple  
8 of questions after I point your attention to  
9 that section, okay?

10 A. Okay.

11 Q. Let's take a look, and if you  
12 are looking on the paper it is page 3.  
13 there's specific demand responses and we are  
14 at number one. Let me know when you are  
15 finished reading demand number 17 and his  
16 response.

17 MR. KATAEV: It is cut off  
18 on the screen. I'm going to  
19 ask him to read this.

20 MS. TROY: Let me know  
21 when you guys are done.  
22 (The witness peruses the  
23 document).

24 THE WITNESS: What is your  
25 question?

1 Ishaque Thanwalla

2 Q. The question is: is it accurate  
3 to say that the weekly sales records were  
4 not turned over as part of the Supplemental  
5 Response?

6 A. The weekly sales records were  
7 not part of this part of the record.

8 Q. Let me backtrack for a moment.  
9 Do you recall earlier today that you  
10 mentioned that there was a weekly record of  
11 the sales of the cars as well as the  
12 commission, and the bonuses, et cetera for  
13 each car's salesman at Hillside Auto?

14 A. Yes, yes.

15 Q. The question was: was that  
16 record provided as part of the Responses  
17 that are in 17, again, it's a yes or no  
18 question?

19 MR. KATAEV: Objection to  
20 the form. You can answer.

21 A. Yes.

22 Q. You are saying it was turned  
23 over?

24 A. Yes.

25 MS. TROY: Please just

1 Ishaque Thanwalla

2 turn that over.

3 MR. KATAEV: Put it in  
4 writing and I will respond.

5 Q. Turning your attention to  
6 question 21, a similar process. Please read  
7 over the question with your counsel, read  
8 over the question and the response and let  
9 me know when you are done because I will  
10 have a question for you.

11 MS. TROY: Does he want on  
12 the screen or on the paper?

13 THE WITNESS: I would like  
14 it on the screen better.

15 MS. TROY: Perfect, tell  
16 me when I should scroll down.

17 A. Okay.

18 Q. If you don't mind, just read 39  
19 and let me know when you are done with the  
20 question and the response.

21 A. Okay.

22 Q. Is number 39, correct to the  
23 best of your knowledge?

24 A. Yes.

25 Q. Read the request number 40, and

1 Ishaque Thanwalla

2 let me know when you are done, the request  
3 and the response.

4 A. Okay. What's your question?

5 Q. My question is, is it correct to  
6 say that there are no complaints for unpaid  
7 wages from anyone, including your employees?

8 A. You are telling me unpaid wages  
9 that I am not paying someone, they have a  
10 complaint?

11 Q. Correct.

12 A. I can't remember -- I have never  
13 paid anyone lost wages, people I mostly paid  
14 people.

15 Q. The question is not about the  
16 underlying facts, but the fact that the  
17 complaint has the name, whether that was a  
18 formal complaint in the Court or a non-  
19 informal complaint.

20 My question is: did you turn over all of  
21 the documents that you have in your  
22 possession pertaining to any such  
23 complaints?

24 A. Yes, I have.

25 Q. Earlier when you mentioned, when

1 Ishaque Thanwalla

2 I asked you if you were a party to any  
3 Action, do you recall that there was a New  
4 York State Court Action against you for  
5 wages?

6 A. You bring that up, I respect  
7 that you saw that, I only owed her a hundred  
8 bucks. A hundred bucks in wages.

9 Q. My question is: as part of the  
10 State Law Action, did you receive any  
11 documents?

12 A. Yes, probably, but I can't  
13 recall 100 percent.

14 Q. Let me just scroll down to  
15 number 46. Please read that request and  
16 answer and let me know when you are done.

17 A. 47?

18 Q. 46, I said.

19 A. 46? Okay, what's your question  
20 on this.

21 Q. Besides Leticia, who else was a  
22 female car salesperson at Hillside Auto  
23 Outlet?

24 A. There was a lot of female  
25 salespersons that worked for me in time, but

1 Ishaque Thanwalla

2 I can't recall everybody's name.

3 Q. Now, when Leticia was working,  
4 Leticia was a female person --

5 A. There was more than one, more  
6 than one, but I can't recall everybody's  
7 name. I can't recall.

8 Q. Do you recall receiving a  
9 Complaint for sexual or pregnancy  
10 discrimination from Lilly or anyone else?

11 A. Never received anything from  
12 Lilly.

13 Q. How about overall in general  
14 from anyone?

15 A. Received it from Leticia and I  
16 was stunned. After she left, I generally --  
17 in July and August we received some kind of  
18 pregnancy discrimination, hourly rate, and I  
19 was stunned, I was highly stunned. She was  
20 treated like family and she left because she  
21 got a better job opportunity elsewhere. I  
22 really took it to heart, because I tried to  
23 treat her as my own. You can see that on  
24 the text messages, 90 percent, close to  
25 that, I have treated her like my family



1 Ishaque Thanwalla  
2 until she left, and she changed colors. She  
3 was coerced. I don't know.

4 Maybe somebody did that coaching, the  
5 only person, her parents or her mother or  
6 her father. They both were in the lawsuit,  
7 maybe she was coached to do that, but I have  
8 no idea.

9 MS. TROY: Let's refrain  
10 from personal attacks of  
11 anyone's father or mother.  
12 Let's just try to finish  
13 this.

14 THE WITNESS: I am saying  
15 that they are both lawsuit  
16 happy.

17 MS. TROY: I appreciate  
18 that, but --

19 THE WITNESS: She's trying  
20 now.

21 MS. TROY: I appreciate  
22 your feedback. Let's focus  
23 for a second on the topic.

24 A. Yes.

25 Q. So, question 47 and the

1 Ishaque Thanwalla

2 response, can you read that question and  
3 answer and let me know when you are done.

4 A. Okay.

5 Q. The question is, whether any  
6 other investigations occurred after Leticia  
7 complained, made the complaint?

8 A. Not that I know of.

9 Q. I'm going to turn your attention  
10 to this portion that is highlighted in the  
11 Response. This portion of the Response says  
12 that documents ``were previously withheld  
13 solely for requests number 21, 34 43, 44, 45  
14 (Angris Guzman only), 58, 75, 79, 80, 85,  
15 89, 90, 91, and 92.'' Is that a correct  
16 statement to the best of your knowledge?

17 A. Is that what you requested  
18 earlier?

19 Q. Please focus on my question.  
20 The question is: does this statement, is it  
21 true to the best of your knowledge, the one  
22 that I have highlighted?

23 A. I can't answer that question yes  
24 or no. I can't, I don't think the question  
25 is so in reality, and I am dyslexic. Can

1 Ishaque Thanwalla  
2 you elaborate the question and I will answer  
3 your question?

4 Q. Sure. So your attorney  
5 mentioned that some of the Responses, some  
6 of the other Responses, that there are  
7 various objections, and the Judge, the  
8 defendant, clarified that with respect to  
9 some of the Responses. This statement says  
10 that there are documents that were not  
11 provided because of the objections and then  
12 listed the numbers.

13 So, my question for you is, is that  
14 correct to the best of your knowledge? If  
15 you don't know, just say that you don't  
16 know.

17 A. I don't know.

18 MS. TROY: So, if you  
19 don't mind, just find out and  
20 let me know when you have had  
21 a chance to do so. That  
22 would be great.

23 I'm going to ask the  
24 reporter to leave a blank  
25 space in the transcript for

1 Ishaque Thanwalla

2 that information.

3  
4 (Insert)

5 MS. TROY: That is the  
6 last question, those are all  
7 the questions I have for you  
8 today, Mr. Thanwalla. Thank  
9 you. I appreciate your time.

10  
11 [Time noted 5:19 p.m)  
12  
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1	Ishaque Thanwalla		
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Ishaque Thanwalla

REQUESTS

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	footage.	
5	MS. TROY: Demand No 5 is:	81
	Provide police report, both	
	of which concerns the robbery	
	that took place at Hillside Auto	
	Outlet.	
6	MS. TROY: Demand No 6 is:	118
	provide the name as well	
	as the position for each of	

1 Ishaque Thanwalla  
2 the individuals who the  
3 witness identified as numbers  
4 21,22,2,23,24,4,13,3,25,17,26  
5 27,28,29,20,30,31,32,33,34,19,  
6 35,36,38,39 and 37.

7 7 MS. TROY: Demand No. 7 is: 119  
8 Provide written documents  
9 containing the cars sold,  
10 the name of the customer,  
11 the bonus and commissions  
12 received.

13 8 MS. TROY: Demand No 8 is: 120  
14 provide any electronic files  
15 or inputs by the office  
16 manager or her assistant  
17 regarding the same.

18 9 MS. TROY: Demand No 9 223  
19 is: Provide the unredacted  
20 version of the documents,  
21 because there is clearly some  
22 confusion as to who and what  
23 or even if Mr. Parsons  
24 actually was there.

25 10 MS. TROY: Demand No 10 is: 163

Ishaque Thanwalla

Cutting to the chase,  
if you could just provide  
the unredacted version of  
the documents, because there  
is clearly some confusion as  
to who and what or even if  
Mr. Parsons actually was there.

11 MS. TROY: Demand No 11 is: 175

Mr. Kataev, it appears that  
this is the Decipher app,  
and it's a black and white  
photograph of the actual video.  
My question is, can you get me  
the actual video?

12 MS. TROY: Demand No 12 is: 224

The secondhand dealer license  
and the certificate of authority  
that was mentioned and referred  
to was never produced. I'm making  
a post-demand request for it.

13 MS. TROY: Demand No 13 is: 42

(Insert)

14 MS. TROY: Demand No 14 is: 66

(Insert)



Ishaque Thanwalla

15 MS. TROY: Demand No 15 is: 66

(Insert)

16 MS. TROY: Demand No 16 is: 74

(Insert)

17 MS. TROY: Demand No 17 is: 236

(Insert)

QUESTIONS MARKED FOR A RULING: PAGE/LINE

(None)

ACKNOWLEDGMENT

STATE OF NEW YORK )

)s.s.

COUNTY OF NASSAU )

I, Ishaque Thanwalla, hereby  
certify that I have read the transcript of  
my testimony taken under oath in my  
deposition of February 24, 2023; that the  
transcript is a true, complete and correct  
record of my testimony, and that the  
answers on the record as given by me are  
true and correct.

\_\_\_\_\_  
ISHAQUE THANWALLA

Signed and subscribed before me  
this \_\_\_\_ day of \_\_\_\_\_, 2023.

\_\_\_\_\_  
Notary Public

C E R T I F I C A T E

STATE OF NEW YORK )

)s.s.

COUNTY OF NASSAU )

I, LYNN LUCKMAN, a Shorthand  
Reporter and Notary Public within and for  
the State of New York, do certify that;

THAT the witness whose deposition  
is hereinbefore set forth, was duly sworn by  
me, and that such deposition is a true  
record of the testimony given by such  
witness.

I further certify that I am not  
related to any of the parties to this action  
by blood or marriage; that I am in no way  
interested in the outcome of this matter.

IN WITNESS WHEREOF, I have  
hereunto set my hand this 8th day of  
March, 2023.

A handwritten signature in cursive script that reads "Lynn Luckman". The signature is written in dark ink and is positioned above a horizontal line.

LYNN LUCKMAN

1 Errata Sheet

2

3 NAME OF CASE: LETICIA FRANCINE STIDHUM -against- HILLSIDE AUTO AVE, LLC

4 DATE OF DEPOSITION: 02/24/2023

5 NAME OF WITNESS: ISHAQUE THANWALLA

6 Reason Codes:

7 1. To clarify the record.

8 2. To conform to the facts.

9 3. To correct transcription errors.

10 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

11 From \_\_\_\_\_ to \_\_\_\_\_

12 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

13 From \_\_\_\_\_ to \_\_\_\_\_

14 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

15 From \_\_\_\_\_ to \_\_\_\_\_

16 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

17 From \_\_\_\_\_ to \_\_\_\_\_

18 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

19 From \_\_\_\_\_ to \_\_\_\_\_

20 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

21 From \_\_\_\_\_ to \_\_\_\_\_

22 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

23 From \_\_\_\_\_ to \_\_\_\_\_

24

25 \_\_\_\_\_

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